6.0 COORDINATION AND COMMITMENTS

6.1 Summary of Coordination

A multi-level outreach and coordination program was conducted while preparing the Draft and Final SEIS. The program incorporated meetings, newsletters, presentations and hearings to encourage broad participation. The outreach efforts included government entities, interested groups and the general public. The outreach and coordination program generated input throughout project development and review through methods including two rounds of individual meetings with each community within, as well as communities bordering the Project Corridor, presentations at city council and interest group meetings, publication of two newsletters with wide distribution within and outside the Project Corridor, publication of newspaper articles, multiple meetings with ELPC/BPI and other interested groups, and two public hearings following completion of the Draft SEIS. The public hearings were well publicized and attended by over 600 individuals representing varied interests. Publication of the Draft Supplemental EIS and the subsequent public hearings generated over 2,300 comments. The outreach and coordination program implemented while preparing the Draft and Final SEIS was in addition to the publicity and considerable outreach conducted over the past 15 years this project has been planned, studied and reviewed.

6.1.1 Federal Agencies

The Federal Highway Administration (FHWA), U.S. Environmental Protection Agency (USEPA), U.S. Fish and Wildlife Service (USFWS), and U.S. Army Corps of Engineers (USACE), and U.S. Department of Interior were among the federal agencies involved during the preparation of the Draft and Final SEIS. Agency involvement included issue identification, development and review of mitigation concepts and plans, provision of data, and document review for compliance to applicable policy and regulation. Refer to Draft SEIS, Section 6.1.1 for additional information.

6.1.2 State Agencies

State agencies involved during the preparation of the Draft SEIS included: the Illinois Environmental Protection Agency, Illinois Historic Preservation Agency (IHPA), Illinois State Toll Highway Authority (ISTHA) and Illinois Department of Natural Resources (IDNR). As with the federal agencies, state agency involvement included issue identification, development and review of mitigation concepts and plans, provision of data, and document review for compliance to applicable policy and regulation. Refer to Draft SEIS, Section 6.1.2 for additional information.

6.1.3 Regional Agencies

Regional agencies also contributed to the development of the Draft SEIS. Regional agencies included: Metra, the Regional Transit Authority (RTA) and Pace which provided data on existing and planned facilities within and adjacent to the Project Corridor which were incorporated into the No-Action (Baseline) and Build Alternatives, and the Northeastern Illinois Planning Commission (NIPC) and Chicago Area Transportation Study (CATS) which compiled and modeled population, traffic and travel time forecasts

used for evaluating project need and alternatives. Refer to Draft SEIS, Section 6.1.3 for additional information.

6.1.4 County and Local Governments

County and local government involvement included: Will, DuPage and Cook Counties, The Village of Woodridge, Village of Lemont/Lemont Township, Village of New Lenox, Village of Romeoville, City of Lockport, Village of Mokena, Village of Frankfort, Village of Bolingbrook, City of Joliet, Will County and Homer Township. Involvement included providing data, review of Project Alternatives as to consistency with local plans and public outreach. Other County agencies involved included the Will County Highway Department which assisted in identifying local road projects for inclusion within the baseline roadway network used for the No-Action (Baseline) Alternative, and the Forest Preserve District of Will County (FPDWC) which partnered with IDOT in selecting sites and developing mitigation plans for Section 4(f) impacts to Keepataw Forest Preserve. Refer to Draft SEIS, Section 6.1.4 for additional information.

6.1.5 Interested Groups

Interested groups were kept informed of the progress through questionnaires, newsletter mailings and meetings. Parties included Environmental Law and Policy Center (ELPC), Business and Professional People for the Public Interest (BPI), and New Alternatives, Inc. Refer to Draft SEIS, Section 6.1.5 for additional information.

6.2 Recreational Land Coordination

Refer to the 1996 FEIS, Section 5.6 and 1996 FEIS, Section 6.2.

6.3 Environmental Coordination Field Review

There have been no field meetings since publication of the 1996 FEIS.

6.4 Commitments

Draft SEIS, Section 6.5 details commitments for this Supplement. For additional information of the Commitments, Standard Measures and Specific Measures or Other Commitments, refer to 1996 FEIS, Section 6.5.1 and 1996 FEIS, Section 6.5.2.

6.5 Public Involvement

6.5.1 Public Meetings

Given the limited scope of the Draft SEIS and extent of previous coordination, general public meetings were not held as part of the supplement process.

6.5.2 Public Hearings

The project Public Hearings were held at two locations within the Project Corridor in February 2001. Both sessions were held in an open-house format from 3:00 p.m. to 9:00 p.m., with the same information available at both locations. The first session was held Thursday, February 8, 2001 at Lincoln-Way High School (Central Campus) in New Lenox, Illinois. The second session was held on Wednesday, February 14, 2001 at the Lemont Centennial Community Center located in Lemont, Illinois. A 17-page handout, display boards and an 8-minute audiovisual presentation were used to explain the project.

Copies of the project's 1996 FEIS and Draft SEIS were available for viewing at both sessions. At both sessions, project staff was present to discuss the project and answer questions. Representatives were available to discuss a wide variety of project issues including: right-of-way, property acquisition, noise and noise barrier walls, land use, drainage and a number of environmental issues. Comment tables were set up with blank comment forms and a comment submission box to facilitate making comments. Court reporters were present for those desiring to record their comments verbally. The sites were accessible to the disabled and provisions were made to accommodate those needing special arrangements.

Legal notices of the Public Hearings were published in three Chicago suburban newspapers, The Herald News (January 18 and 25), Woodridge Progress (January 25 and February 1), and Daily Southtown (January 18 and 25). In addition, a Public Hearing Informational Flyer was mailed out to the entire project mailing list of 2,500, including citizens, businesses, elected officials and the media.

Following the hearing, a copy of the Public Hearing Video was sent to state, local and federal agency officials in the Project Corridor.

Approximately, 625 citizens, elected officials, and media attended the Public Hearings. The February 8 Public Hearing drew about 325 persons, and the February 14 Public Hearing drew about 300 persons.

6.5.3 Draft SEIS Comment Responses

The Notice of Availability was published on December 29, 2000. Originally, the comment period was scheduled to close on February 28, 2001, but following requests the comment period was extended to April 30, 2001. A notice of the comment period extension was published in the March 23, 2001 Federal Register in the USEPA section under Amended Notices.

A total of 2,336 individual comments were received within the period from the release of the Draft SEIS through April 30, 2001. Of the comments received, 71 percent were in support, 25 percent were opposed to the southern extension, and 4 percent submitted comments, however did not declare a position on the matter. The majority of the comments received related specifically to subject matter presented in the chapters and sections in the Draft SEIS. The comments were divided into seven main categories: Purpose and Need for Action, Affected Environment, Alternatives, Environmental Consequences, Section 4(f) Evaluation, Coordination and Commitments and Miscellaneous. Comments that merely stated a fact or an opinion, although helpful in defining and selecting a response, are not specifically detailed in this section. Comment responses as appropriate cite more detailed discussions in the 1996 FEIS and in the Draft SEIS.

Comments were also divided by commenting parties. The comments received from Federal, State and Local Governmental Bodies and interested groups are listed first and are separated from public comments which are listed second. Appendix A presents two reference tables that match the commenting parties with the applicable comment/response numbers. Appendix A also contains copies of comment letters received from Federal, State and Local Governmental Bodies and interested groups.

In addition to the individual comments, petitions and public opinion survey cards were also submitted. A total of 17,176 signatures were submitted on petition forms declaring support or opposition to the proposed Southern Extension of I-355. Of the petitions received, 79 percent signed in support and 21 percent signed in opposition.

DRAFT SEIS FEDERAL, STATE, AND LOCAL GOVERNMENTAL BODIES AND INTERESTED GROUPS COMMENTS AND RESPONSES.

1.0 PURPOSE AND NEED FOR ACTION

1.1 COMMENT: Existing and planned land use (Draft SEIS, Exhibit 1-7) overstates the percentage of land in commercial/industrial categories somewhat, particularly in the Des Plaines River Valley and west of State Street. Mixed use is more descriptive of these areas.

1.1 RESPONSE: To simplify the exhibit, the multiple land use categories of the base maps were combined into the three land use categories of residential, commercial/industrial and open. Mixed use is included within the commercial/industrial category.

1.2 COMMENT: The purpose and need is unduly narrow. The Draft SEIS appropriately identifies four general areas of need, but then picks and chooses among objectives from the 2020 Regional Transportation Plan and define the need within each category in such an impermissibly narrow way that only the proposed tollroad could possibly satisfy the need.

1.2 RESPONSE: The purpose and need is sufficiently broad, and is based upon a detailed review of the 2020 Regional Transportation Plan (RTP). Each goal and objective was carefully reviewed to determine its relevance to the identified needs. The information in the Draft SEIS on present and projected congestion levels and area population forecasts is sufficient to demonstrate that a Build Alternative is needed. The alternatives analysis clearly demonstrates that a reasonable range of Alternatives was considered.

1.3 COMMENT: The NEPA prohibits IDOT's unreasonable narrow definition of Purpose and Need.

1.3 RESPONSE: NEPA states that the Purpose and Need must be sufficiently broad to allow consideration of a reasonable range of alternatives. The Alternatives considered in the Draft SEIS included transit, transportation system management, three roadway build alternatives and a No-Action (Baseline) alternative. The roadway build alternatives represented a range of facilities, types and alignments and were developed to cover a range of build scenarios from improvements to local arterials to a freeway/tollroad facility. All roadway Build Alternatives included transit and transportation system management and a group of other local roadway improvements (No-Action (Baseline) Alternative).

1.4 COMMENT: IDOT's needs analysis ignores numerous critical goals identified in the regional transportation plan.

1.4 RESPONSE: IDOT used the RTP goals and objectives as part of the process to develop Purpose and Need for the project. Each goal and objective was carefully

reviewed to determine its relevance to the identified needs. Many of these goals are regional in nature and do not translate well at the project level.

1.5 COMMENT: IDOT's analysis of the need to achieve land use and transportation planning goals is circular.

1.5 RESPONSE: As documented in the DRAFT SEIS, 98% of the 2020 population will be in place regardless. The current [explosive] development trends are not due to the non-existent facility (I-355). The length of time required to implement major projects allows local government opportunities to modify the project or their plans to best fit their community needs. County and local plans have designated over 75 percent of the Project Corridor for development. This level of development is planned for whether or not the Preferred Alternative is implemented. 100 percent of the municipal and county government jurisdictions within the Project Corridor support the Preferred Alternative as the alternative that will best enable them to achieve their planning goals based upon reviews by professional staff.

2.0 AFFECTED ENVIRONMENT

2.1 COMMENT: Draft SEIS, Section 2.9 dealing with cultural resources does not adequately address historic structures. Continue to work with the Illinois Historic Preservation Agency (IHPA) to insure that Section 106 of the National Historic Preservation Act of 1966, as amended, is addressed prior to the issuance of the Final EIS.

2.1 RESPONSE: Extensive coordination is documented in the 1996 FEIS and further analysis is offered in the Final SEIS, Section 2.9 and Final SEIS, Section 4.8. IDOT and ISTHA will continue to work with IHPA to address outstanding concerns.

2.2 COMMENT: The presence of the state threatened Blanding's Turtle has been omitted under the State Listed Species Section on page 2-33 (Draft SEIS, Section 2.12.3). While the District does not feel that the Tollroad development will necessarily eliminate the species from the Project Corridor, however, the species does occur within the Corridor and should be addressed.

2.2 RESPONSE: The Blanding's Turtle was not found within the Project Corridor according to the 1998 Biological Survey Update completed by Illinois Natural History Survey. The Illinois Natural History database search completed in 2001 concurred with the results of the Biological Survey in that the Blanding's Turtle was not found within the Project Corridor. A herpetologist will be on-site during construction to monitor any potential conflicts.

2.3 COMMENT: The project must not preclude or foreclose opportunities for landscape management capabilities, enhancing habitat continuity and collectively sustaining, restoring, protecting and preserving resources. The District seeks a commitment for such assurance.

2.3 RESPONSE: Comment noted. The project is seeking to make appropriate landscape accommodations, including the above listed concerns. IDOT and ISTHA will continue to work with local agencies.

3.0 ALTERNATIVES

3.1 COMMENT: Secure adequate right-of-way width to allow the proposed toll-road/freeway to be expanded to six lanes in the future from 127th Street to I-80. Also ensure bridges within the four-lane cross sections are constructed to accommodate six lanes in the future.

3.1 RESPONSE: Comment noted. The facility has been designed to facilitate expansion should traffic volumes warrant.

3.2 COMMENT: City of Joliet recommends the capability to add an interchange at Bruce Road in the future.

3.2 RESPONSE: Comment noted.

3.3 COMMENT: Draft SEIS, Section 3.2, (a) the Alternatives were not adequately discussed. There was no justification or analysis of the Alternatives and what the scoring of these Alternatives was based on. (b) The Draft SEIS does not disclose the environmental benefits of each Alternative. (c) The Draft SEIS also fails to consider the current residential needs and uses of the transportation system as part of the Alternative Analysis. (d) The Draft SEIS continually discusses the issue of safety as a primary reason for the development of this extension. However, it does not detail current safety statistics and how safety would be increased with a toll-road relative to local roadway improvements.

3.3 RESPONSE: (a) See Draft SEIS, Section 3.4 for the performance evaluation. The analysis of Alternatives presented is based on scoring derived from a rigorous technical analysis, yielding quantifiable travel time, safety and productivity measures. Methods are disclosed in the Draft SEIS, Appendix A and B. (b) NEPA environmental analysis quantifies environmental consequences to allow comparison among Alternatives as well as to allow for avoidance, minimization and mitigation. An environmental review of alternatives was added to Chapter 3. (c) Draft SEIS, Section 1.2.4 and Draft SEIS, Section 3.4.4 address residential need and uses of the transportation system as they pertain to local travel within the Project Corridor. These sections identify local roadway system deficiencies and evaluate performance of the No-Action (Baseline) Alternative relative to each of the Build Alternatives in addressing local system deficiency using the following quantitative performance measures.

1. Local travel time as measured by percent decrease in travel time within the Project Corridor over the No-Action (Baseline) Alternative of each Build Alternative.
2. Cost Savings as measured by the productivity cost savings resulting from the travel time savings associated with each Build Alternative.
3. Safety as measured by percent improvement in crash rates within the Project Corridor over the No-Action (Baseline) Alternative.

(d) Draft SEIS, Section 3.4.4 shows the performance of the Build Alternatives in improving safety by comparing crash rates. The findings of this analysis are presented in Draft SEIS, Table 3-7 and Draft SEIS, Appendix B.

3.4 COMMENT: The local roadways will still require improvements. Development of the Tollway will not alleviate these problems, especially with the increased growth and use of the local roads to travel to the interchange.

3.4 RESPONSE: The Preferred Alternative will not preclude the implementation of local roadway improvements, but work in consort with local roadway improvements to improve local mobility. The performance evaluation for the three Build Alternatives assumed implementing local roadway improvements proposed and anticipated to be constructed by IDOT and Will County officials by the year 2020. These local improvements are referred to as the No-Action (Baseline) Roadway Improvements. In general, transportation planning is a continuous process, and the I-355 proposal is not intended to resolve all the county's problems. Draft SEIS, Section 2.2.1 and Draft SEIS, Section 3.2.1 describe local road improvement projects comprising the No-Action (Baseline) Roadway Improvements.

3.5 COMMENT: If travel time is the primary issue, there is a greater need to establish and develop affordable housing within the major job market corridors. This will prevent further congestion and promote development closer to the Chicago urban fringe. Promoting residential development within an area that lacks sufficient employment opportunities perpetuates and supports the reliance on increased vehicle usage while increasing air quality problems.

3.5 RESPONSE: Year 2000 Census determined that Will County is the second fastest growing County in Illinois. Population growth is rapidly occurring within the Project Corridor. Substantial growth is coming regardless of the Proposed Action. NIPC projects an 80 percent increase in population over 1990 Census population estimates. The I-355 South Extension would contribute less than two percent of the population growth projected for the Project Corridor by 2020.

While the I-355 South Extension is needed to improve access to job centers within DuPage and northwestern Cook County, it will also improve access to the Project Corridor. Jobs available in the Project Corridor are projected to double by 2020. Nonetheless, there will still be a need for workers in the job centers to the north of the Project Corridor.

Furthermore, the Illinois EPA reviewed the potential Air Quality impacts of the Preferred Alternative and found the project will have negligible impacts on air quality and will not hinder attainment of air quality standards by the statutory date of 2007.

3.6 COMMENT: A meaningful analysis of Alternatives was not conducted. From the statement of purpose to the definition of need to the selection of regional goals and objectives addressed, the scope is severely limited.

3.6 RESPONSE: The Purpose and Need was defined to include a broad array of Alternatives ranging from the Tollroad/Freeway Alternative to improvements of ar-

terials. In addition, transit improvements were also considered in the initial screening. Need was identified through a review of regional goals and objectives as defined in the 2020 Regional Transportation Plan (2020 RTP) as well as local needs. The preferred alternative is a combination of roadway, transit, and TSM/TDM strategies.

3.7 COMMENT: We do not concur that only the Tollroad/Freeway Alternative has been shown to meet the established purpose and need criteria. Information presented in the Draft SEIS indicates that the Lemont Bypass Alternative also satisfies the purpose and need criteria. We strongly urge your Agency to issue an additional supplementary environmental impact statement fully identifying and evaluating the environmental impacts of the Lemont Bypass Alternative.

3.7 RESPONSE: Information regarding environmental effects of all the Build Alternatives considered in the Final SEIS has been included in Chapter 3. In the context of local/regional plan consistency, the review found that the overall difference in environmental effects were not substantive between Build Alternatives. The performance analysis presented in Chapter 3 shows clearly that the Lemont Bypass Alternative is inferior to the Tollroad/Freeway Alternative. It was concluded that the Tollroad/Freeway Alternative would improve regional travel times 144 percent over the Lemont Bypass Alternative. In addition, the Tollroad/Freeway Alternative is 100 percent consistent with local comprehensive plans. Portions of Chapter 3 have been enhanced to illuminate this, but an additional supplement is not required.

3.8 COMMENT: NEPA regulations state that an Environmental Impact Statement should present environmental impacts of the Alternatives in comparative form. The document ignored the environmental impacts of the Enhanced Arterial Alternative, the Lemont Bypass Alternative, the Mass Transit Alternative and the Action Plan.

3.8 RESPONSE: Information regarding environmental effects of the three Build Alternatives has been added to Chapter 3. In the context of plan consistency, the review found that the difference in environmental effects were not substantive among the Alternatives. This combined with the findings of the plan consistency review conducted by professional planning staff of the local jurisdictions which ranked the Tollroad/Freeway Alternative as most consistent with local plans made the Tollroad/Freeway Alternative as best satisfying the need criteria for plan consistency. The Tollroad/Freeway Alternative also outperformed the Lemont Bypass and Enhanced Arterial Alternatives for the other three need criteria. Therefore, the Tollroad/Freeway Alternative is the only Alternative that satisfies Purpose and Need. The Lemont Bypass and Enhanced Arterial Alternatives did not satisfy Purpose and Need and were eliminated from further consideration in Chapter 4, Environmental Consequences. Additional information is presented in Final SEIS, Section 3.4.2.

3.9 COMMENT: The range of Alternatives is improperly narrow. The Draft SEIS presents no meaningful choices. The Alternatives boil down to three versions of a single road running up the spine of the Project Corridor. No multi modal or net-

work-based alternatives were presented. The multi modal, comprehensive Action Plan Alternative presented by commentors was completely ignored.

3.9 RESPONSE: The range of Alternatives is sufficiently broad. The Alternatives analyzed in the Draft SEIS cover a 125 square mile study area, and are multi-modal, with each including a network of roadway improvements, transit upgrades, and TSM/TDM strategies. As noted in commentors submittal, the Action Plan was indeed reviewed prior to the release of the Draft SEIS, and is clearly not an alternative to the I-355 proposal.

3.10 COMMENT: The analysis of Alternatives was inadequate. The benefits of the Alternatives were compared using inappropriate criteria. Detrimental impacts of the tollroad on local roads were not disclosed. The comparative environmental impacts of the various Alternatives were not analyzed, in direct violation of NEPA.

3.10 RESPONSE: The Alternatives evaluation is comprehensive. The Alternatives evaluation is supported by a rigorous technical analysis of travel performance that defined and compared travel time savings and safety, and including separate socioeconomic and corresponding travel demand forecasts for the No-Action (Baseline) and Build Alternatives. The impact of the I-355 extension on local roadways is documented in the Draft SEIS in Chapters 2 and 3 (Exhibit 2-6 and Exhibits 3-4 through 3-7). Clearly, the largest impact to local roadways will be the growth coming regardless of any of the Build Alternatives, which will be addressed as part of ongoing and future transportation planning. The environmental effects of the Build Alternatives were also reviewed. The review found no substantive difference in overall environmental effects among the Alternatives.

3.11 COMMENT: The great majority (three quarters) of the traffic forecast to cross the Des Plaines River on I-355 in 2020 is from crossings that do not take place in the No-Action (Baseline) scenario, i.e. are “induced” by the new road. As providing bridge capacity is expensive in both financial and environmental terms, a cost benefit analysis should be done.

3.11 RESPONSE: The traffic changes at the river crossings are not due to induced travel. Rather, these changes are a result of trips being redistributed on the roadway network. This conclusion is supported by comparison of the river crossings under the No-Action (Baseline) and Enhanced Arterial Alternatives. CATS model results show similar traffic volumes, which is not surprising given the constraint in travel over the river in this area is bridge capacity. The lack of bridge capacity forces travelers to either choose a longer more circuitous route or fill travel needs at less attractive destinations that, given the inaccessibility of destinations across the river, are relatively more accessible. As soon as the bridge capacity constraint is removed, travel patterns are rearranged into a more uniform pattern.

3.12 COMMENT: Except for the bridge crossings, the CATS traffic model fails to adequately capture induced travel demand. The model actually predicts lower vehicle miles of travel (VMT) in the Tollroad/Freeway scenario than in the No-

Action (Baseline) scenario. This is contrary to economic theory and to published research on induced travel.

3.12 RESPONSE: Commentors mistakenly attribute Regional P.M. Peak VMT results to the Project Corridor. Under the Build scenarios, the Corridor daily VMT increased, based on development patterns in the Corridor and on changes in accessibility, which is consistent with economic theory and published research.

3.13 COMMENT: Flawed modeling in the Draft SEIS led to a gross overstatement of the tollroad benefits. Actual tollroad benefits are likely to be minor, at best, even for most regional trips. The tollroad would provide no appreciable local travel benefits.

3.13 RESPONSE: Commentors have drawn erroneous conclusions regarding CATS travel demand modeling tools, specifically CATS use of an "intervening opportunities" model (IOM), which commentors claim leads to incorrect trip length distributions. This assertion is incorrect because CATS trip distribution model is actually a gravity type model (used by commentors) combined with a more sophisticated calculation of the cost of travel (friction) between each origin and destination. It considers both the time and the cost for all available modes in the trip interchange (as do many gravity models), but also incorporates the number and proximity of opportunities available to complete the trip – the so-called "intervening opportunities". The IOM formulation of friction includes an opportunity measure based upon a composite travel cost and the probability of stopping at any single attraction, while the standard Gravity Model approach uses only auto travel times. Inclusion of an opportunity measure (the L-value) introduces a behavioral component that is lacking in the standard Gravity Model specification. By introducing the probability of accepting intervening destinations into the friction specification, the IOM better reflects travelers' behavior. Trips are not always satisfied at the nearest (least cost) destination or the largest "mass" of attractions. The IOM model is state of the practice, Federally accepted, and its consideration of intervening opportunities when calculating the attractiveness of possible destinations makes it superior to gravity models.

3.14 COMMENT: The Draft SEIS greatly overstates the travel time savings from the I-355 extension for trips made by Will County residents to regional destinations.

3.14 RESPONSE: Modeling professionals accept that different modeling processes will always produce different results. The relevant issue is not actual travel times—it is the relative comparison between them. Based upon the data submitted by commentors, both models are in agreement that a trip using the entire I-355 extension would realize the greatest travel time savings, approximately 20% - 25%.

3.15 COMMENT: The Action Plan provides regional travel benefits comparable to the I-355 Extension.

3.15 RESPONSE: This conclusion is not supported by commentors travel performance results, which show that the Action Plan generally performs worse than the I-355

Extension. This is especially clear for trips that would likely be utilizing the I-355 extension.

3.16 COMMENT: The Action Plan should be carried forward in the SEIS process as an alternative to the tollroad. It provides regional travel benefits comparable to the tollroad, and its local travel benefits are likely to far outweigh those of the tollroad.

3.16 RESPONSE: Fundamentally, the Action Plan is not an alternative to the I-355 Extension, and will not be carried forward in the SEIS. The Action Plan improvements represent an updated version of the No-Action (Baseline) Alternative, which will be constructed regardless of the I-355 extension. This point is confirmed by commentors analysis, which shows that the travel benefits of the Action Plan to be essentially the same as the No-Action (Baseline) Alternative, and less compared to the I-355 Extension.

3.17 COMMENT: The travel benefits of the proposed tollroad are so negligible as to call into question anew the cost and environmental harms can possibly be justified. At a minimum, the paltry benefits of the tollroad would lead to a reexamination of Alternatives rejected by IDOT in the Draft SEIS.

3.17 RESPONSE: The proposed I-355 extension provides travel benefits that are clearly superior to other Alternatives considered, including the Action Plan.

3.18 COMMENT: NEPA requires a rigorous analysis of reasonable Alternatives.

3.18 RESPONSE: The No-Action (Baseline) and the three Build Alternatives were determined to be reasonable and were given a rigorous performance analysis. This analysis is contained in Final SEIS, Section 3.4.

3.19 COMMENT: The selected Alternatives are unjustifiably narrow.

3.19 RESPONSE: The preferred alternative is a broad combination of roadway, transit, and TSM/TDM strategies.

3.20 COMMENT: The Draft SEIS arbitrarily limits Alternatives to a single mode.

3.20 RESPONSE: The preferred alternative is a broad combination of roadway, transit, and TSM/TDM strategies.

3.21 COMMENT: The Draft SEIS arbitrarily limits Alternatives to a single “Route”.

3.21 RESPONSE: First, the alternatives represent networks of roadway improvements. Second, the preferred alternative is a broad combination of roadway, transit, and TSM/TDM strategies.

3.22 COMMENT: The Draft SEIS arbitrarily excludes projects outside of the Study Area.

3.22 RESPONSE: The purpose of this project is to improve access and mobility to and within the Project Corridor. The No-Action (Baseline) improvements, which are part of all Alternatives, included improvements to transit and local roadways. The local roadway improvements included within the No-Action (Baseline) were those roadway improvements influencing access and mobility within the Corridor

as identified in cooperation with local transportation officials representing jurisdictions within the Project Corridor.

3.23 COMMENT: The Draft SEIS unjustifiably fails to consider the Action Plan Alternative.

3.23 RESPONSE: Fundamentally, the Action Plan is not an alternative to the I-355 Extension, and will not be carried forward in the SEIS. The Action Plan improvements represent an updated version of the No-Action (Baseline) Alternative, which will be constructed regardless of the I-355 extension. This point is confirmed by commentors analysis, which shows that the travel benefits of the Action Plan to be essentially the same as the No-Action (Baseline) Alternative, and inferior to the I-355 Extension.

3.24 COMMENT: Regional Mobility uses a measure that is unclear and needs some analysis and explanation of where residents of the area currently travel.

3.24 RESPONSE: The intent of the regional travel criteria is to evaluate the benefit of each Build Alternative toward improving overall mobility within the region and is not specific to residents of the Project Corridor. Draft SEIS, Exhibit 3-10, Draft SEIS, Exhibit 3-11, and Draft SEIS, Exhibit 3-12 clearly show the difference among Alternatives in improving mobility for travel throughout the region from three points along the interstate system, the roadways generally used for travel within and through the greater Chicago metropolitan region.

3.25 COMMENT: The Local System Deficiency Analysis may include the influence of longer regional trips.

3.25 RESPONSE: The method used for determining local travel time measured the travel time to and from all zones within the Project Corridor only, and includes travel times in all directions during the a.m. peak. The measure includes the influences of all local, regional, business, pleasure, etc. trips on local travel time because they all influence local mobility within the Project Corridor. Refer to Appendix B, Travel Time Analysis for a description of the analysis methods.

3.26 COMMENT: The local travel time analysis does not account for all additional traffic induced by the Tollroad/Freeway particularly on East-West Streets.

3.26 RESPONSE: The local travel time analysis measured all trips (and thus in all directions) in Project Corridor for each alternative.

3.27 COMMENT: NEPA mandates that an EIS include a comparative analysis of the environmental impacts of the Alternatives.

3.27 RESPONSE: Information regarding environmental effects of the three Build Alternatives has been added to Chapter 3. In the context of plan consistency, the review found that the difference in environmental affects were not substantive between Alternatives. This combined with the findings of the plan consistency review conducted by professional planning staff of the local jurisdictions which ranked the Tollroad/Freeway Alternative as most consistent with local plans made the Tollroad/Freeway Alternative best in satisfying the need criteria for plan consistency. The Tollroad/Freeway Alternative also outperformed the Lemont By-

pass and Enhanced Arterial Alternatives for the other three need criteria. Therefore, the Tollroad/Freeway Alternative is the only Alternative that satisfies Purpose and Need. The Lemont Bypass and Enhanced Arterial Alternatives did not satisfy Purpose and Need and were eliminated from further consideration in Chapter 4, Environmental Consequences. Additional information is presented in revised Final SEIS, Section 3.4.2.

3.28 COMMENT: The Draft SEIS fails to study and compare the environmental impacts of IDOT's Alternatives.

3.28 RESPONSE: Information regarding environmental effects of the three Build Alternatives has been added to Chapter 3. In the context of plan consistency, the review found that the difference in environmental affects were not substantive between Alternatives. This combined with the findings of the plan consistency review conducted by professional planning staff of the local jurisdictions which ranked the Tollroad/Freeway Alternative as most consistent with local plans made the Tollroad/Freeway Alternative as best satisfying the need criteria for plan consistency. The Tollroad/Freeway Alternative also outperformed the Lemont Bypass and Enhanced Arterial Alternatives for the other three need criteria. Therefore, the Tollroad/Freeway Alternative is the only Alternative to satisfy Purpose and Need. The Lemont Bypass and Enhanced Arterial Alternatives did not satisfy Purpose and Need and were eliminated from further consideration in Chapter 4, Environmental Consequences. Additional information is presented in revised Final SEIS, Section 3.4.2.

3.29 COMMENT: Compared to Tollroad, the Action Plan's performance on travel to regional job centers is nearly as good as the Tollroad; and, with respect to local trips, the Action Plan will have far greater benefits than the Tollroad.

3.29 RESPONSE: This conclusion is not supported by commentors travel performance results, which show that the Action Plan generally performs worse than the I-355 Extension. This is especially clear in for trips that would likely be utilizing the I-355 extension.

3.30 COMMENT: The Draft SEIS dismisses non-tollroad Alternatives out of hand. The proposed tollroad would have negligible benefits at best. If the other Alternatives fail to meet the purpose and need, the tollroad should not either.

3.30 RESPONSE: Based on rigorous technical analysis, the Tollroad/Freeway Alternative provided the best performance.

3.31 COMMENT: If land use feedback were included, the calculated benefits of the proposed I-355 extension would be even less. The travel time model used in the Draft SEIS is insensitive to behavioral adjustments caused by excessive delays.

3.31 RESPONSE: The significant issue is whether travel times are internally consistent. That is, the relative differences within the modeling system accurately portray how much better or worse different destinations or routes are. CATS travel times are internally consistent, and the models have been calibrated and validated using them. The Commentor incorporated a peak-shifting model to shift traffic

away from the peak hour and into adjacent time periods. Commentor has not indicated how many trips left the peak hour to maintain "reasonable" travel times or what the impact on other periods was. It is possible that we would find Commentor travel times in other periods to be longer than those CATS produces due to the migration of trips to those periods. Unfortunately, Commentor did not model traffic for other time periods, so the results cannot be compared.

3.32 COMMENT: IDOT's unjustifiably narrow interpretation of the need to improve regional mobility eliminates all Alternatives except a highway.

3.32 RESPONSE: Transit alone will not adequately address projected travel demand.

The Preferred Alternative combines transit, roadways, and TSM/TSD.

4.0 ENVIRONMENTAL CONSEQUENCES

TRANSPORTATION FACILITIES

4.1 COMMENT: Where is the study of the environmental impact of the increased traffic on local arterials?

4.1 RESPONSE: A worst-case analysis was performed for air quality. Three worst case locations were evaluated at 143rd Street and the proposed ROW, the proposed Toll Plaza and at the proposed I-55/I-355 interchange. The findings are reported in the Draft SEIS, Section 4.12. Noise analysis was performed along the entire length of the proposed Tollroad/Freeway Alternative including crossroads. Results are presented in Draft SEIS, Section 4.1.3. Any issues regarding local roadway widening required for the Tollroad/Freeway are addressed by subject area within the biotic and social impacts subsections.

SOCIAL IMPACTS

4.2 COMMENT: We ask IDOT/ISTHA support in partnering with the Village of New Lenox, the New Lenox Township and the County of Will in providing a safe and convenient sidewalk approach to the New Lenox School District 122 school site, which will be in close proximity to the cloverleaf configuration at I-80 and the termination of I-355.

4.2 RESPONSE: IDOT/ISTHA will continue to work with local communities and the county to address concerns.

4.3 COMMENT: The Draft SEIS fails in its consideration of the impacts on students of at least three schools currently within or being built adjacent to the FAP 340 Corridor. The schools are the Old Quarry Middle School, the new Homer Township Junior High, and the new New Lenox Junior High.

4.3 RESPONSE: These facilities were constructed based upon full knowledge of the I-355 Extension. IDOT/ISTHA will continue to work with local communities and county to address concerns.

4.4 COMMENT: IDOT inappropriately minimizes the extent of the environmental and societal impacts resulting from the I-355 South Extension on wetlands, stream crossings, the Hines emerald dragonfly, the Old Quarry Middle School.

4.4 RESPONSE: The wetland delineation was updated in June 2000 and a new impact analysis was conducted and presented in Draft SEIS, Section 4.10.3. Impacts to all stream crossings were inventoried and evaluated in the 1996 FEIS, Section 4.10.2. Impacts to the Hines Emerald Dragonfly were evaluated in the 1996 FEIS. The 1996 FEIS found the Tollroad/Freeway Alternative would not impact the Hine's emerald dragonfly. Draft SEIS, Section 4.11.3 provides the basis of this finding. This evaluation lead to a commitment by IDOT to work cooperatively with appropriate state and federal agencies to develop a recovery plan. This plan is currently being implemented. Concerning Old Quarry Middle School, IDOT/ISTHA provided a noise analysis of the proposed site prior to construction of the school. The school was located based on the results of that study. IDOT/ISTHA will continue to work with local communities and county to address concerns.

BIKEWAYS

4.5 COMMENT: We encourage IDOT/ISTHA to continue efforts to ensure that a bikeway be included with this project.

4.5 RESPONSE: A portion of the right-of-way has been reserved for construction of the bikeway by others.

WATER QUALITY AND WATER RESOURCES

4.6 COMMENT: Bio-engineering technologies and natural materials are preferred over rip-rap for stream bank stabilization.

4.6 RESPONSE: Stream bank stabilization will be in accordance with standards in place at the time of construction.

4.7 COMMENT: The Draft SEIS does not specify the erosion control measures to be utilized at Spring Creek and the other receiving streams in the Project Corridor. Describe in detail the measures to be used in each watershed.

4.7 RESPONSE: As stated in Draft SEIS, Section 4.19, options in the "Procedures and Standards for Urban Soil Erosion and Sedimentation Control in Illinois" will be utilized. In addition, erosion control procedures will be followed as set forth in Section 107.23 of the Illinois State Toll Highway Authority Standard Specification. If constructed by IDOT, erosion control procedures will be used according to policy. The two specifications are similar. These methods were developed to minimize erosion control in a variety of conditions, including those of the Project Corridor. Specific measures will be consistent with these procedures and will be identified in the Erosion Control Plan. The detailed Erosion Control Plan will be prepared for the NPDES permit as well as for the U.S. Army Corps of Engineers Section 404 permit in subsequent phases of project development.

4.8 COMMENT: Provide additional details regarding the anticipated impacts to Spring Creek and the various water related projects proposed along the stream system.

4.8 RESPONSE: The 1996 FEIS recognized the greenway concept associated with the Spring Creek corridor as promoted by the Forest Preserve District of Will

County. Additional text has been added to the water quality section of the Final SEIS, Section 4.10 to identify the IDOT/ISTHA wetland mitigation areas and Forest Preserve District holdings.

Analysis of the Spring Creek detention basin system and roadway runoff indicated that the water quality standards for Spring Creek would be maintained. This detention basin system should also protect the hydrologic regime of the stream.

4.9 COMMENT: Describe whether or not transportation of salt directly into surface water will be monitored and what ISTHA or IDOT will do if chloride levels increase to problematic levels.

4.9 RESPONSE: One of the commitments described in Draft SEIS, Section 4.20.1 is the continuation of the monitoring program for Black Partridge Creek before, during, and after construction. This program is ongoing and will be continued in accordance with this commitment. However, the chloride contribution associated with the proposed roadway is only one factor in the stream water quality. Other adjacent land uses and point sources contribute to the quality of streams in the Project Corridor. For example, the Black Partridge Creek watershed is currently affected by runoff from developed areas. IDOT and ISTHA have assessed their future contribution to streams and have incorporated best management practices to reduce these contributions. Therefore, the chloride contribution of the proposed roadway should not result in concentrations greater than the water quality standard. If chloride concentrations in the receiving streams exceed the water quality standard, then the watershed would require evaluation by the Illinois Environmental Protection Agency.

4.10 COMMENT: The Draft SEIS did not provide an aggregate pollutant assessment of the project as a contributor to the Des Plaines River. Describe how this contribution is analyzed in totality in the Alternatives analysis.

4.10 RESPONSE: Water quality impacts are assessed upon a concentration basis as that is the governing factor in determining toxicity. All water quality standards are based upon stream concentrations rather than pollutant loadings. Thus, maintaining the water quality standard provides protection for aquatic indigenous species in the receiving streams and is the goal of any project. An aggregate pollutant loading does not provide information that can be readily used to determine water quality impacts.

4.11 COMMENT: The Draft SEIS fails to substantiate compliance with the requirements for avoidance and minimization of wetland impacts as set forth in Section 404 of the Clean Water Act. The Draft SEIS does not present the anticipated wetlands impacts that would be associated with implementation of the Lemont Bypass Alternative.

4.11 RESPONSE: An environmental review of the three Build Alternatives has been added to Chapter 3. Wetlands are a component of this additional information. Data is provided for many other environmental factors as well. The review found that the difference in potential environmental affects were not substantive between Alternatives. This combined with the findings of the plan consistency re-

view conducted by professional planning staff of the local jurisdictions which ranked the Tollroad/Freeway Alternative as most consistent with local plans showed the Tollroad/Freeway Alternative as best satisfying the need criteria for plan consistency. The Tollroad/Freeway Alternative also outperformed the Lemont Bypass and Enhanced Arterial Alternatives for the other three need criteria. Therefore, the Tollroad/Freeway Alternative is the only Alternative to satisfy Purpose and Need. The Lemont Bypass and Enhanced Arterial Alternatives did not satisfy Purpose and Need and were eliminated from further consideration in Chapter 4, Environmental Consequences. The additional information is presented in Final SEIS, Section 3.4.2.

4.12 COMMENT: Since the proposed tollway extension will directly cross one of Black Partridge Creek's tributaries as well as a large portion of its watershed, describe the impacts of the road construction and operation upon Black Partridge Creek with respect to cool surface flow, increased erosion, removal of vegetation, or other adverse impacts.

4.12 RESPONSE: The upper reaches of the Black Partridge Creek watershed have been developed for commercial and residential uses, while the lower reaches are located in forested areas. During roadway construction, erosion control measures in the upper reaches will control sedimentation reaching the stream; however, little to no vegetation will be removed, especially at the point of the tributary crossing, as the area has been developed. In the lower reaches where forested areas occur, the closest point of the roadway will be approximately 92m (300ft) from Black Partridge Creek. With this separation distance, maintenance of a wooded buffer, and proper erosion control techniques, potential impacts are minimized. Drainage patterns to the stream will be maintained except for areas within the roadway right of way.

4.13 COMMENT: Describe in detail operational impacts of roadway runoff containing salt upon streams with low or intermittent flows (such as Fraction Run, Fiddyment Creek, Big Run, Long Run) or no flow at all (such as the numerous wetlands that may receive runoff from the roadway). Describe the effects on terrestrial areas.

4.13 RESPONSE: Operational impacts associated with deicing activities were analyzed for all streams utilizing design information and the estimating method developed by the U.S. Geological Survey (USGS). This USGS method predicted average and maximum stream chloride concentrations resulting from the proposed roadway. These concentrations all were below the Illinois Environmental Protection Agency's general use water quality standard for chlorides of 500 mg/L. These standards protect aquatic species in these streams. If the standard is achieved, then no water quality impacts will occur. Detention basins and grass-lined ditches have been incorporated into the drainage design. These features maintain hydraulic patterns and provide reduction of peak chloride concentrations.

No wetlands will receive direct roadway runoff other than the Des Plaines River floodplain wetlands 42 and 43. This runoff associated with deicing is only discharged after collection in the detention basin.

Terrestrial areas were discussed in the 1996 FEIS under cover types. The proximity to the roadway and salt tolerance of woody species affects the potential impact to wooded areas. Many of the dominant plant species show tolerance of salt with the exception of basswood trees showing moderate to poor tolerance.

4.14 COMMENT: Describe the possible cause and effects of salt deposition in the Des Plaines River Valley.

4.14 RESPONSE: Information regarding effects of salt dispersion in the valley was discussed relative to the Hine's Emerald dragonfly and woody vegetation. The discussion of potential vegetative chloride impacts remains representative of the proposed project. The DRAFT SEIS, Section 4.10.2 describes the potential effects of salt deposition and Section 6.5.2 outlines our specific commitment for studying salt spray dispersion and its ultimate deposition.

4.15 COMMENT: Describe the likely concentrations of salt and of other pollutants in the runoff from the detention pond and describe the ability of the biota in Wetlands 42, 43, and 44 to tolerate these pollutants.

4.15 RESPONSE: Salt concentration in the detention ponds will vary with weather conditions and precipitation events. The detention basin discharges to the floodplain area labeled Wetland 42 and Wetland 43. These detention ponds will be routed through an old trail to the floodplain area. As previously discussed in the 1996 FEIS, the two-year storm event will flood Wetland 42 and parts of Wetland 43. The predominant vegetation in Wetland 43 includes box elder, cottonwood, and black willow. These species are salt tolerant (Source: Kelsey, Patrick, "Salt Tolerance at Selected Temperate Trees and Shrubs"; The Morton Arboretum, December 1994). Reed canary grass is an invasive, weedy species that grows in most wetland areas that are degraded. Reed canary grass is also salt tolerant. Therefore, the discharge from the detention basin should not affect the dominant species in these areas. Also, these wetlands already are exposed to flood waters of the Des Plaines River and the spring chloride concentrations in the Des Plaines River typically reach 250 mg/l.

The predominant vegetation in Wetland 44 includes box elder, reed canary grass, and rice cutgrass. Box elder trees are salt tolerant (Source: Kelsey, Patrick, "Salt Tolerance at Selected Temperate Trees and Shrubs"; The Morton Arboretum, December 1994). Reed canary grass is an invasive weedy species, which grows in most wetland areas that are degraded. Reed canary grass is listed as a plant which tolerates roadside salt on the listing that the Chicago Botanic Garden provides. Rice cutgrass is a dominant grass species in Wetland 44. Rice cutgrass is tolerant to degraded water quality conditions and is a grass species commonly used in wetland and detention pond plantings in degraded conditions.

4.16 COMMENT: Describe the effects upon Wetland 42, 43, and 44 of direct runoff from the roadway. This direct runoff occurs for storm events greater than the two-year storm event.

4.16 RESPONSE: The pollutant concentrations are highest in the first flush of a storm event. That is, the storm intensity determines the pollutant wash-off. Typically, a one-inch rainfall for 120 minutes (which approximately represents a two-year storm event) will washoff 99 percent of the pollutants. The bridge design captures this runoff with the greatest pollutant concentration and provides for the discharge of more dilute storm water runoff. Snow melt volumes from the bridge should reach the stilling basin based upon melt rates. Therefore, the existing vegetation diversity of Wetland 42, 43 and 44 is not expected to be affected by these discharges.

4.17 COMMENT: It should be noted within the EIS that ISTHA's wetland mitigation area and IDOT's proposed regional wetland bank, and the District's current holdings are immediately downstream of the Spring Creek Bridge. Greater consideration on how the Tollway Extension would likely impact the establishment and ecological maintenance of higher quality wetlands is warranted.

4.17 RESPONSE: The final document (Section 4.10.2) describes the mitigation areas and their relationship with Spring Creek and runoff from the extension. Consideration will be given to this relationship and design elements.

4.18 COMMENT: The 1996 FEIS, pp. 2-35 and 2-43, described "Wetland 44" as harboring an Illinois-listed species (slender sandwort) and a rare sedge (Carex Crawei) and having a Natural Area Rating Index of 36.4, which is high enough to qualify it as possessing "sufficient Conservatism and richness to be of profound importance from the regional perspective." The Draft SEIS, however, omits any mention of this wetland and appears to lump it in with lower-quality areas as a new "Wetlands 42" with a significantly lower rating. (The "Wetland 44" described in the Draft SEIS is a different wetland.) Since the original Wetland 44 appears to be directly within the path of (or extremely close to) the roadway and of unusually high quality, it is unclear why consideration of it is no longer included in the Draft SEIS. How will the environmental benefits of this wetland (wildlife habitat, sediment trapping, flood storage) and its rare and threatened species be protected?

4.18 RESPONSE: The discussion of wetland impacts in 1996 FEIS, Section 4.0 is primarily unchanged. Refer to this chapter for information regarding the wetland. The project is bridging over this wetland, thereby minimizing impacts. First flush roadway runoff is being diverted from the wetland, however, stormwater flows beyond the first flush are not being bypassed to maintain hydrology.

4.19 COMMENT: Describe the effect of the roadway on the Des Plaines River seeps. Describe any groundwater disruptions or increased pollutant loadings during construction or operation that will affect the seeps. Describe the mitigation of these effects.

4.19 RESPONSE: The Des Plaines River seeps are west of the proposed roadway and Black Partridge Creek seeps are east of the proposed roadway within the Nature Preserve. These seeps are expected to be affected at the same order of magnitude or less than the Black Partridge seeps based upon the modeling results of Illinois State Geological Survey. Refer to the 1996 FEIS, Section 4.10.5.

4.20 COMMENT: The Draft SEIS outlines plans to mitigate runoff from the I-355 extension by diverting such runoff to local streams. Will this impact Spring Creek? Will Spring Creek contaminate the Hadley Valley Aquifer which is the drinking water support for the east side of Joliet? Will salt spray impact the Hadley Valley Aquifer?

4.20 RESPONSE: The Hadley Valley Aquifer is an important water resource that was investigated during the preparation of the 1996 FEIS. The City of Joliet well locations were evaluated relative to the proposed roadway. Chloride intrusion potential was evaluated based upon distances, drainage systems, and the estimated chloride concentrations of Spring Creek. Runoff from the proposed project will not be directly discharged to local streams. All drainage from the roadway, embankments, and adjacent right-of-way areas will be collected and channeled through either ditches or storm sewers to detention basins and then discharged to Spring Creek. Collection of the roadway drainage is important as it reduces the opportunity for runoff to seep directly into the soil. This minimizes the opportunity for intrusion. Runoff managed with detention basins will reduce the peak chloride concentrations discharged to Spring Creek. It is anticipated that the chloride concentrations entering Spring Creek will not exceed 500 mg/L, the general use water quality standard. Furthermore, the closest well in the City of Joliet is located 800 feet from the FAP Route 340 alignment. The City of Joliet setback zone established to protect community water supplies is 400 feet. Specific sources of potential contamination such as underground storage tanks or salt piles cannot be placed within that setback zone. The proposed roadway is also outside of the setback zone requirements.

Salt spray represents a small contribution (1 to 3%) of the total salt applied to a roadway. This contribution is also dispersed over a large area. There will be no effects of salt spray upon the Hadley Valley Aquifer based upon the area of salt deposition and the magnitude of the contribution.

4.21 COMMENT: Secondary salt discharges from sediment along the bluff could affect fens and seeps. Also, the groundwater flow up gradient of the fen and seep community could be affected by shifting in surface water runoff quality.

4.21 RESPONSE: Changes observed to date in fens and seeps of the Project Corridor would be attributed to development of the watershed. The Illinois State Geological Survey (ISGS) modeled groundwater flow and chloride transport toward the seep areas based upon highway operation. This highway will represent one percent of the watershed area and the ISGS evaluation did not identify any increase in groundwater chloride concentrations as a result of highway operation.

For example, for Fraction Run, the current drainage design includes five dry detention basins and one wet detention basin at 167th Street. These basins are designed to minimize hydrologic changes associated with increased impervious areas. Given the use of one wet detention basin, usage of grass-lined effluent ditches, and a mixture of roadway and service building runoff, the water quality standards associated with roadway pollutants will be maintained. For Fiddyment Creek, two dry detention basins are planned. The length of these effluent ditches, the contribution of the proposed project to the watershed, and the crossing location reduce potential water quality impacts to Fiddyment Creek. There are six dry detention basins within the Long Run watershed. Two of the basins have effluent ditches that will reduce suspended particulates and heavy metals. There are four detention basins planned for the Big Run watershed, seven detention basins planned for the tributary to Hickory Creek, and five detention basins planned for the Spring Creek watershed.

4.22 COMMENT: Describe the projected road salt dispersion patterns and salt disposition concentrations expected on the landscape and the associated impacts upon wetlands and these analyses should consider the direct, indirect, secondary, and cumulative impacts by reviewing additional data, other road projects, and applicable related studies. Since I-55 source data was projected from deicing 4 lanes rather than the proposed 6 lanes for the extension, the study expects deposition values to increase by 50% of the findings. These increased concentration values should be plotted on the isogram.

4.22 RESPONSE: A road salt dispersion study has been initated as a commitment to this project. The result of this study will be an air dispersion model for predicting salt dispersion. The salt deposition results for I-55 have been presented; however, elevation of the roadway in the Des Plaines River Valley would affect any patterns of deposition patterns. Detailed analysis cannot be completed until data are collected during roadway operation; however, such data will be generated as a component of the ongoing studies.

BIOLOGICAL RESOURCES

4.23 COMMENT: Northeastern Illinois Planning Commission recommends that the roadway corridor be landscaped predominantly in native prairie vegetation, instead of turf grass.

4.23 RESPONSE: The landscaping plan will include native prairie vegetation in appropriate locations.

4.24 COMMENT: The presence of the Blanding's Turtle was also omitted in this section and should be included in the list of State-Listed Species on page 4-21.

4.24 RESPONSE: The Blanding's Turtle was not found within the Project Corridor according to the 1998 Biological Survey Update completed by Illinois Natural History Survey. The Illinois Natural History database search completed in 2001 concurred with the results of the Biological Survey in that the Blanding's Turtle was not found within the Project Corridor. A herpetologist will be on-site during construction to monitor any potential conflicts.

4.25 COMMENT: The Draft SEIS does not explain how to mitigate impacts on the foraging of the state-threatened great egret, night heron, double-crested cormorant, pied-billed grebe, and common moorhen. 1996 FEIS, Section 4.11.3.2 noted that roadway construction would "reduce or eliminate" the foraging grounds near the roadway for these birds, but listed no mitigation measures (other than that the birds might become habituated to humans or that disturbances might decrease as foliage eventually grows and screen the birds from human activity).

4.25 RESPONSE: There is ample foraging habitat remaining in the Valley as to not impact these species. An update of the avian survey conducted for the FAP 340 Corridor in November 1998 concluded that no changes occurred that would suggest that the avian composition within the Project Corridor has been significantly altered or that would suggest the need for additional field work. The reversion of abandoned agricultural and developed land to old-field conditions does provide some additional habitat for common breeding and migratory bird species; however, no endangered or threatened bird species are dependant upon this habitat.

AIR QUALITY

4.26 COMMENT: The construction of the Tollway within a corridor that currently lacks employment opportunities only increases reliance on vehicle use, increasing air quality problems.

4.26 RESPONSE: As documented in Draft SEIS, Section 2.4.2, the Project Corridor will experience explosive growth regardless of the I-355 extension. The I-355 South Extension conforms to the existing State Implementation Plan and the transportation-related requirements of the 1990 Clean Air Act and Amendments as documented in Draft SEIS, Section 4.12.

4.27 COMMENT: An analysis of air quality impacts has not been conducted. The differential effects of auto emission on air quality under different Alternatives have not been calculated.

4.27 RESPONSE: An air quality analysis has been conducted on the Preferred Alternative. The results are presented in Draft SEIS, Section 4.12.

4.28 COMMENT: The Draft SEIS unlawfully fails to estimate the Ozone-related impacts of the Tollroad Alternative.

4.28 RESPONSE: As documented in our December 22, 2000 letter to commentors, the Illinois EPA has stated that an analysis of ozone related impacts is not warranted. Based upon conformity modeling performed by CATS, the emissions of VOC and NOx associated with the I-355 Extension will have a negligible impact upon ozone air quality. In addition, the impacts of the I-355 extension have been accounted for in the Illinois EPA's State Implementation Plan (SIP) for the area, and will not hinder reaching attainment by the statutory deadline, 2007.

NOISE

4.29 COMMENT: Noise attenuation barriers may be needed in Lemont where the toll-way passes a middle school and residential subdivisions.

4.29 RESPONSE: Noise analysis for the area surrounding the proposed 127th Street interchange and the Old Quarry Middle School was performed and results from this analysis indicates the school does not warrant noise mitigation. Both the new Homer Township Junior High School and the new New Lenox Junior High School were not modeled as is consistent with the position of IDOT and FHWA that developments platted after the April 1999 Notice of Intent would not be modeled.

However, reviewing the location of both facilities indicates that neither would likely be eligible for noise attenuation barriers. Homer Township Junior High School is located east of Gougar Road and south of 151st Street. Homes west of Gougar Road (**closer** to the alignment) were analyzed for mitigation. Our analysis found these homes did not qualify for a barrier.

New Lenox Junior High School is located approximately 1,000 feet south of the mainline of I-80. The mainline has most of the traffic and generates most of the noise. A barrier is not effective at this distance. While the ramp will be located closer to the school, the traffic is much less on the ramp. It is unlikely that the school would qualify for noise mitigation.

4.30 COMMENT: It is recommended that IDOT confirms to the Village of Woodridge that potential noise impacts to the Vincente Development have been considered. In addition, consideration should be given to providing noise absorptive surface on the north side of any noise barrier that would be located opposite residential areas.

4.30 RESPONSE: Potential noise impacts to the Vincente development and adjoining properties were evaluated for impacts and results from this analysis do not warrant mitigation.

4.31 COMMENT: In Draft SEIS, Section 4.13.6 (page 4-32), there was no discussion of the District's Centennial Trail, which is a component of the Grand Illinois Trail, or the development of a trail though Keepataw. ISTHA is aware of the trail system and an agreement between the Districts and ISTHA has been extended until Spring 2004 regarding the use of ISTHA's haul road bridge for a trail through Keepataw. However, the Draft Supplemental Final Environmental Impact Statement does not indicate any of these items and the impact to them in the analysis.

4.31 RESPONSE: As there were no changes in development within the Keepataw Forest Preserve since the publication of the 1996 FEIS, impacts to Keepataw remain as described in the 1996 FEIS, Section 4.13.6. The proposed trail through Keepataw was not designed or programmed at the time of the Draft SEIS, and therefore was not assessed for noise impacts. However, as referenced in the 1996 FEIS, traffic noise was modeled in Keepataw and predicted noise levels did not reach Noise Abatement Criteria levels.

4.32 COMMENT: Noise levels were predicted for the roadway, with levels measured by receptors for the road segment in question. The first concern involves an acknowledged deficiency within the noise modeling methodology; namely, that only future traffic noise is predicted by the noise model, while the present-day measurements included both traffic and background (or ambient) noise levels. The projected Average Daily Traffic figures, however, were partially dependant on anticipated growth and development in Will County inherent in the population forecasts – development that will influence future ambient noise levels. The year 2020 design-year noise levels are therefore incomplete, and seem to us problematic in assessing the true need for noise attenuation barriers.

4.32 RESPONSE: Noise attenuation barriers will solely have an affect on roadway noise, and will not affect existing or future ambient noise levels. At locations where modeled noise levels warranted attenuation barriers due to roadway noise, barriers are proposed.

4.33 COMMENT: Who will be responsible for monitoring noise levels in the future? What levels will be acceptable? Who will determine acceptability? Who will design, pay for, and construct future mitigation measures?

4.33 RESPONSE: Depending on the type of facility constructed, freeway or tollway, either IDOT or ISTHA will be responsible for monitoring noise levels. Both agencies have published noise abatement criteria, which will be used to determine all future noise mitigation along the Corridor.

4.34 COMMENT: Illinois Route 171 – The measurement at Receptor 32 (Draft SEIS, Exhibit 4-6 and Draft SEIS, Table E-1) is alarming. We understand the explanation given for the supposed ineffectiveness of a barrier at this location, though we continue to have concerns regarding the lack of consideration of future ambient noise levels. However, we see no evidence for the statement that "a continuous wall is not possible at this location" given in the footnote of Table E-1. "Not Possible" is different from "not warranted", and clarifying the distinction will help with future analysis and abatement options, should they become necessary.

4.34 RESPONSE: Noise attenuation barriers have no affect on ambient noise levels; therefore consideration of future ambient noise levels is not necessary. The phrase "not possible" will be changed to "not warranted".

4.35 COMMENT: I-80/I-355 South Extension interchange – Although the Draft SEIS says the noise here will decline, it seems to us this will not in fact be the case. The noise generated by both I-80 and the new roadway needs to be combined for an overall noise level. When combined, we feel that additional barriers should be constructed around Receptors 3, 12, 23, 24, and 26 (Draft SEIS, Exhibit 4-6) along the southern and southeastern edge of the interchange/ramp system, and not just the western segment.

4.35 RESPONSE: The noise levels of the proposed roadway and I-80 were combined and analyzed at the same time. The analysis found that Receptors 3, 12, 23, 24, 25, and 26 do not warrant noise attenuation barriers.

4.36 COMMENT: 135th Street – the predicted noise levels for Receptors 50 and 51 from Draft SEIS, Table E-1 also generated concern about the level of noise created by I-355 at this crossing. Barrier construction should be considered at this overpass to reduce impacts to the surrounding area.

Table E-1 indicates a "Noise Barrier A," but again, without exhibit 4-14, we see no correspondence to what this means.

4.36 REPONSE: As indicated in Draft SEIS, Table 4-6, noise attenuation barriers were considered for Receptors 50 and 51 but did not warrant implementation. Barriers at Receptor 50 were found to be not economically reasonable or feasible based on cost compared to benefit and did not provide substantial noise abatement. Barriers at Receptor 51 were found to not be economically reasonable or feasible based on cost compared to benefit.

Table E-1 should refer to Draft SEIS, Exhibit 4-6. The appropriate changes have been made.

VISUAL IMPACTS

4.37 COMMENT: Does IDOT or ISTHA still intend to transfer the land proposed as visual buffer along Lemont Woods and Black Partridge to the District?

4.37 RESPONSE: No, IDOT did not intend to transfer ownership of the buffer. However, IDOT does intend to transfer management of the buffer within Will County to the Forest Preserve District of Will County. Having the land in public ownership with appropriate management will maximize the benefits of this land as a buffer to the Nature Preserve.

SECONDARY AND CUMULATIVE IMPACTS

4.38 COMMENT: The Draft SEIS does not give sufficient detail of the cumulative impacts that construction of the extension will have on the region. The extension will likely increase the need for all services related to greater residential and commercial growth, including existing infrastructure and community services. Community service needs include park and open space requirements. The existing parks, preserves and public facilities will likely become overused and negatively impacted.

4.38 RESPONSE: Draft SEIS, Section 4.20, states that while the study area is undergoing rapid growth, County and municipal governments within the Project Corridor have planned for this growth and have adopted land use plans that designate over 75 percent of the Project Corridor for development. This land is planned for development with or without the I-355 South Extension. The remaining lands are protected park and preservation lands. The local governments have formed the Heritage Corridor Planning Council to manage the growth and associated impacts.

The Proposed Action combined with other Federal actions and local economic development efforts would act to promote growth and development within the Project Corridor. However, the portion of future growth attributable to the Proposed Action is low, amounting to 0.6 percent of population and 0.1 percent of employment growth within the Study Area. Therefore, the mitigation discussed

herein would be commensurate with the secondary and cumulative impacts projected for the Proposed Action. No additional mitigation would be required.

4.39 COMMENT: As greater residential communities develop, there will be a greater demand for parks and preserves, which may or may not be possible to acquire. As growth in the Project Corridor increases, so will the market value for land, thus limiting the financial ability of open space preservation organizations to acquire land for such purposes. There should be greater discussion of these issues and recommendations on how to mitigate secondary and cumulative impacts, including open space protection.

4.39 RESPONSE: The incremental population growth stimulated by the Preferred Alternative is estimated to be less than 2 percent of the overall projected growth within Study Area by the year 2020. The Preferred Alternative will not be substantive factor in future open space issues.

4.40 COMMENT: When discussing the roadway's possible secondary effects, the Draft SEIS states that the Tollroad/Freeway Alternative will cause additional population growth of 2% or less. A more useful measure, however, would be estimated additional land development. A study of highway construction in Maryland found that properties near highways tended to be developed more intensively and more rapidly than properties not located near highways. For example, in Montgomery County, 93% of all development properties within five miles of I-270 and beyond the beltway were built after the highway was constructed. Similarly, land near highway corridors in Frederick County developed three times faster than land outside the highway corridors. Paving the Way: How Highway Construction Has Contributed to Sprawl in Maryland (Brad Heavner, Maryland Public Interest Research Group, 2000). Is it possible to estimate increased land development, rather than just increased population?

4.40 RESPONSE: The Draft SEIS is based upon a comparison of year 2020 scenarios, and is not structured to analyze rates of development. In terms of densities, Section 2-3 of the Draft SEIS documents that the I-355 Extension would tend to concentrate development within the Project Corridor, leading to less dispersed development patterns.

Land developed or consumed is not a better indicator of the proposed transportation project's impacts, as compared to population, households, and jobs. Forecasts of these socio-economic indicators have been the traditional means used in forecast models, which have been developed and refined over the course of many decades. People and jobs are the factors used to measure travel demand, trips to work and transit ridership. Because these factors are estimated within relatively small units of analysis, they also are a fairly good indication of density and distance, as well.

4.41 COMMENT: Draft SEIS, Section 4.20 fails to address the likely impacts of infrastructure extension to accommodate the increased population and land development the roadway will cause. Increased local road construction, sewer service

extension, and utility construction all would be likely secondary impacts that the Draft SEIS does not consider.

4.41 RESPONSE: The following paragraph is from the 1996 FEIS:

Facility Planning Areas have been preparing for future development in the region, with specific emphasis on sanitary districts. The Lockport Heights and Bonnie Brae Forest Manor Sanitary Districts have proposed sanitary sewers that would eventually cross the FAP Route 340 alignment. Facility planning and infrastructure improvements are part of an on-going process coordinated between local governmental agencies and the Northeastern Illinois Planning Commission.

In addition, the extension will induce less than 2% growth in the study area. This is a small increment of the total growth expected in the area. So, while the area is preparing for growth, the amount attributable to the extension is very small. This increment will not cause substantive impacts on the facilities in the area.

4.42 COMMENT: IDOT's Secondary and Cumulative impacts analysis ignores planned development linked directly to the I-355 South Extension.

4.42 RESPONSE: The secondary and cumulative impacts analysis was based on land use defined in each land use plan of local municipal governments within the Project Corridor and of Will County. The New Lenox plan the commenters are referring to originally designated this area for primarily residential development. The US 6 Office park development does not take land that was not already planned for development but simply changes the development type from residential to commercial. The New Lenox plan was amended to reflect this change. The land use plan presented in the Draft SEIS was modified to reflect this change. This land use change was done with input from NIPC and the public to encourage a compact and dense development pattern that would promote good land use planning concepts.

The Preferred Alternative likely influenced this change and is an example of the benefit of the Preferred Alternative in that it acts to focus growth along the alignment that otherwise may have occurred in a more dispersed pattern within the Corridor. Thus, the Preferred Alternative facilitated (and accounts for) a denser development pattern at a location consistent with local plans.

4.43 COMMENT: Draft SEIS, Section 4.20 further fails to address the possible secondary impacts of the roadway on open space and protected areas envisioned in local plans. According to Draft SEIS, Exhibit 1-7, local plans call for greenways and protected areas along Long Run, Big Run, Fiddyment Creek, Fraction Run, and Spring Creek. All of these areas are located in close proximity to interchanges for the proposed roadway. Presumably, development pressures would make it more difficult to protect these lands as open space and greenways, but the Draft SEIS does not address these impacts or propose mitigation measures.

4.43 RESPONSE: Given the minimal impact the Preferred Alternative would have on local population growth, and the extent that local communities have zoned within

jurisdictional boundaries, open space and greenway preservation will clearly not be substantively impacted by the I-355 extension.

4.44 COMMENT: Nowhere within the Draft SEIS are environmental impacts of the development, which has occurred in anticipation of the proposed extension or planned in anticipation of the proposed extension discussed. For example, New Lenox is planning a waste treatment plant to serve major developments planned for the Route 6 interchange area.

4.44 RESPONSE: The development planned for in the U.S. Route 6 interchange area would occur in the area regardless of whether or not the extension were not built, although the development would likely be less dense. The I-355 proposal would serve to focus the development in a smaller area. Facilities such as waste treatment plants would need to accommodate development, wherever it occurs.

4.45 COMMENT: The Draft SEIS does not address in chapters entitled "Affected Environment" or "Environmental Consequences" that which is likely to result from direct project impacts and then examine resultant shifts in integral system functions and biotic and abiotic processes synergistically triggering indirect, secondary, and cumulative affects to ecosystems throughout this landscape.

4.45 RESPONSE: Direct impacts have been described in the 1996 FEIS and Draft SEIS. Cumulative impacts are discussed in Draft SEIS, Section 4.20.1.

4.46 COMMENT: A commitment is sought to have an exhaustive analysis of indirect, secondary and cumulative impacts expected in an impact zone along the Des Plaines River Bluff and river valley ecosystems.

4.46 RESPONSE: A detailed analysis of affected environment and environmental consequences in the Des Plaines River Valley has been prepared for the project, as documented in Sections 2.7, 2.9 through 2.12, 4.6, 4.8 through 4.11, 4.20, 4.23 and 5.0 of Draft SEIS. IDOT/ISTHA has committed to monitor salt spray throughout and beyond construction, as well as monitor water quality of Black Partridge Creek.

4.47 COMMENT: The Draft SEIS relies upon 2020 population and employment which imply a radical separation of jobs and housing that is contrary to historical experience in the region. This assumption is the basis for a "need" for a huge investment in highway infrastructure in order to move people from Will County to jobs and services outside. Essentially the same land use scenario is applied for all scenarios.

4.47 RESPONSE: The 2020 population and employment forecasts do not imply a radical separation of jobs and housing. There has been a historical trend towards increasing decentralization. In addition, the 2020 forecasts are founded on the nearly 300 local community plans in the six county area, which were aggregated and refined by the Northeastern Illinois Plan Commission (NIPC). In response to guidance from regional leaders, NIPC further refined these forecasts to reflect the use of policy tools to slow decentralization (page 8, 2020 RTP). Despite the influence of these policy tools, there will still be an excess of jobs and therefore a

demand for workers to the north of the study area. Consistent with the 2020 Regional Transportation Plan, we are proposing transportation improvements to meet this need.

5.0 SECTION 4 (f) EVALUATION

5.1 COMMENT: IDOT's Section 4(f) evaluation does not satisfy the law in that it does not consider and compare the impacts across the range of Alternatives.

5.1 RESPONSE: The Section 4(f) analysis is consistent with the law. NEPA regulations require that all feasible and prudent alternatives be considered. A complete range of Alternatives was reviewed to identify those Alternatives that were feasible and prudent. This review found the Tollroad/Freeway Alternative to be the only feasible and prudent Alternative. In compliance with NEPA, multiple alignment changes to the Tollroad/Freeway Alternative were considered to avoid and minimize Section 4(f) impacts. These alignment changes are documented in the 1996 FEIS. Unavoidable impacts are being mitigated. Unavoidable impacts occur to only one Section 4(f) property (the Keepataw Forest Preserve). This Forest Preserve is under the jurisdiction of the Forest Preserve District of Will County. A mitigation plan has been developed and approved by the Forest Preserve District of Will County. Since federal funding under the Lawcon program was used for developing the Forest Preserve, approval of the mitigation plan must be obtained by the National Park Service. The National Park Service has previously reviewed and approved the Keepataw Forest Preserve mitigation plan.

5.2 COMMENT: Section 4(f) impacts are overstated for the Lemont Bypass Alternative in Table 5-2.

5.2 RESPONSE: Table 5-2 has been revised to make the Section 4(f) impacts consistent between the Lemont Bypass and Tollroad/Freeway Alternative for the Tollroad/Freeway Segment in the northern portion of the Corridor.

6.0 COORDINATION AND COMMITMENTS

6.1 COMMENT: The Northeastern Illinois Planning Commission urges IDOT/ISTHA to commit to joining and supporting a process with local governments (convened in the Heritage Corridor Planning Council (HCPC)) to review project design issues, monitor environmental impacts and enforce environmental mitigation plans both during and after construction of the project.

6.1 RESPONSE: IDOT and ISTHA will continue to coordinate with HCPC on issues within the study area and within IDOT and ISTHA jurisdiction.

6.2 COMMENT: There has been a lack of meaningful public involvement.

6.2 RESPONSE: There has been ample public involvement. This most recent effort to prepare the Final SEIS has used a multi-level approach to county and local governments, interested groups and the general population through meetings, newsletters, presentations and hearings. During preparation of this Supplemental EIS, four meetings were held with ELPC/BPI, two rounds of individual meetings were held with each community within and outside the Project Corridor, presentations were made at city council meetings and to interest groups, and two newslet-

ters were published. The newsletter was sent to residences, businesses and public entities within and outside the Project Corridor. Following completion of the Draft Supplemental EIS, two public hearings were held. These public hearings were publicized and attended by over 600 individuals representing varied interests. Publication of the Draft Supplemental EIS and the subsequent public hearings generated over 2,300 comments.

6.3 COMMENT: The public has been subjected to an inferior public hearing process, the "transportation open house". This open house style format does not allow for the public to address the project leaders in a public forum for open discussion.

6.3 RESPONSE: The Open House format has proven to be a very effective means of gathering input and exchanging information. The Public Hearings held in February 2001 for this project were very successful, with over 600 individuals attending, and over 2,300 comments submitted.

6.4 COMMENT: Homer Township Board of Trustees would like to go on record as opposing the entire proposed I-355 interchange at 143rd Street and IL Route 171. It will not be needed and will only cause congestion on local streets.

6.4 RESPONSE: Comment noted. An interchange is needed at IL 171/143rd to provide adequate access to the surrounding roadways and land uses. Reducing the number of interchanges would reduce the efficiency of the surrounding roadway network, and would likely increase congestion at the remaining interchange locations.

7.0 MISCELLANEOUS

7.1 COMMENT: The Draft SEIS has no analysis concerning the economic feasibility of the FAP 340. Is there funding available for this scale of a project? Would implementation of the alternatives be more feasible to implement and fund? How would the public be financially impacted by the construction of the extension, such as increased taxes or tollway costs?

7.1 RESPONSE: The intent of the Final SEIS is to evaluate project impacts in compliance with laws and guidelines of NEPA. NEPA does not require consideration of funding and economic feasibility and is therefore beyond the scope of this Final SEIS.

DRAFT SEIS GENERAL PUBLIC COMMENTS AND RESPONSES

1.0 PURPOSE AND NEED FOR ACTION

1.1 COMMENT: New Lenox and many of the communities within the Project Corridor are rural communities, why do they need a major highway?

1.1 RESPONSE: The county grew by 41% in the last decade, already surpassing its forecasted population for the year 2010. The communities in the Project Corridor are following a similar trend, which is rapidly changing to suburban land uses. This trend is projected to continue, regardless of whether the I-355 Extension is built. The growth has caused increased congestion on area roadways, which are inadequate to handle this increased travel. The I-355 Extension is needed to improve local travel and safety, regional mobility, and achieve local land use and planning goals.

1.2 COMMENT: Commuters should not be accommodated.

1.2 RESPONSE: Work trips are a main component of transportation needs and it is appropriate to account for them.

2.0 AFFECTED ENVIRONMENT

2.1 COMMENT: The population increase projected for Will County and the Project Corridor are unrealistic. Where did these figures come from?

2.1 RESPONSE: The findings presented in the study are consistent with NIPC endorsed population forecasts. The methodology for determining the future population is documented in Draft SEIS, Appendix A.

3.0 ALTERNATIVES

3.1 COMMENT: Concern has been raised regarding the raised median along Archer Avenue (Illinois Route 171) which would prohibit left turns on Archer Avenue as well as existing driveway entrances.

3.1 RESPONSE: Access to adjacent properties and restricted traffic movements will be refined during the design phase. The raised median is intended to minimize conflicting traffic movements and increase safety. Reasonable Access will be provided to all properties along Archer Avenue as well as all other roadways within the Project Corridor.

3.2 COMMENT: Flyover ramps such as those proposed in some of the interchanges along the Preferred Alternative only serve to increase the speed of truck traffic, which is involved in over 50% of the fatal accidents in Illinois. Not using the existing ramps at I-55, which require slower movements, is a waste of money.

3.2 RESPONSE: The capacity of some of the existing loop ramps would be inadequate to handle forecasted traffic. Therefore, flyover ramps are appropriate. Without additional capacity, back-ups would be expected on the mainline creating an unsafe condition.

3.3 COMMENT: Are all interchange concepts final, or is there still room for changes to be made?

3.3 REPONSE: The interchange concepts are final, but the design details are not.

3.4 COMMENT: Why can't the interchange of I-355 and I-80 be moved further east so that Cedar Road would not need to be realigned? Cedar Road should remain where it is and be widened.

3.4 RESPONSE: Several locations, both east and west, were investigated. The proposed interchange location with I-80 was chosen in part due to its skew, or angle of entry, to I-80. Adjustments to the skew could result in an unsafe driving condition and would also require additional right-of-way based on the geometry of ramps at tight angles. The realignment and new bridge for Cedar Road are in part due to an existing geometric deficiency. The vertical sight distance across the Cedar Road Bridge is limited, thereby creating a potentially unsafe condition. The project will correct this situation.

3.5 COMMENT: With the reconstruction of the 135th Street bridge over the Des Plaines River, why isn't there an interchange at 135th Street provided?

3.5 REPONSE: There are two reasons: 1) it is a geometrically challenging location with Long Run Creek adjacent to 135th Street, 2) 135th Street lacks continuity to the east, it ends at Archer Avenue and Archer already has an interchange with the proposed I-355 extension.

3.6 COMMENT: Does the Preferred Alternative include a bikeway?

3.6 REPONSE: South of 127th Street there is a portion of the right-of-way reserved for future bikeway construction by others. In addition, a bridge spanning the Des Plaines River used for construction will remain for future bike and pedestrian use. This bridge would tie Keepataw Forest Preserve with Centennial Trail.

3.7 COMMENT: The Final SEIS should not be approved, as it does not adequately take into account viable alternatives to the proposed tollway. Alternatives that are based on improving local roads and transit exist and would meet the transportation needs of the area without destroying our quality of life.

3.7 RESPONSE: The Draft SEIS included a rigorous evaluation of a broad range of alternatives, all of which include improvements to local roadways and transit. The environmental effects were not distinguishing across the suite of alternatives. The preferred alternative was selected on the basis of its superior travel performance and consistency with local planning.

3.8 COMMENT: There are better alternatives than the Preferred Alternative such as state and county plans to improve local roads and bridges as well as extending Metra service. If local roads were brought up to today's standards, an expressway extension would not be needed.

3.8 RESPONSE: The Draft SEIS included a rigorous evaluation of a broad range of alternatives, all of which include improvements to local roadways and transit. With local travel times projected to worsen by up to 150% over the next 20 years, its clear that major improvements are needed to address congestion.

3.9 COMMENT: The Preferred Alternative calls for a four-lane cross-section in the southern portion, won't this be outdated prior to completion?

3.9 RESPONSE: The project is designed to meet demand through the year 2020. Beyond 2020, the third lane in each direction may need to be addressed.

3.10 COMMENT: Why not develop a rail link to the northern and northwestern job centers? Wouldn't rail be cheaper and more environmentally friendly?

3.10 RESPONSE: This concept is included in the Circumferential Rail Study completed by Metra. The study did not recommend service to the Project Corridor before year 2020.

3.11 COMMENT: The "scientific" studies advocating the I-355 extension are tragically flawed and appear by design to have predetermined outcomes favorable to the extension.

3.11 RESPONSE: IDOT is responding to transportation needs that have been caused by growth that has already occurred. Over the last decade, the county has grown by 41%, making it the second fastest growing county in the state. The Final SEIS includes a rigorous technical evaluation of transportation needs and alternative solutions. The preferred alternative was selected on the basis of its superior travel performance and enjoys overwhelming public support.

3.12 COMMENT: IDOT should consider building only the northbound exit at 127th Street to westbound 127th Street. Traffic traveling northbound on the I-355 extension that is actually going to Lemont can exit at 143rd and Archer and continue toward Lemont on Archer Avenue. This is suggested to avoid putting exit ramp traffic in front of Old Quarry Middle School on 127th Street.

3.12 RESPONSE: IDOT coordinated with the School District prior to construction of the school. The school was sited by the School District based on the knowledge that a ramp was planned and on the findings of a noise analysis completed for the school site completed by IDOT. IDOT and/or ISTHA will work with local jurisdictions during the design phase in accordance with policy to address concerns.

3.13 COMMENT: The proposed I-355 extension could provide for rail rapid transit in the median strip at virtually no additional cost, yet this is not included.

3.13 RESPONSE: Substantial costs would be associated with the addition of rapid transit service in the median of the proposed I-355 extension. These costs would include not only the transit hardware, but also changes to the highway design (such as larger bridge structures and enclosed drainage systems) to accommodate the transit service. The viability of providing rapid transit service also depends upon its system continuity. At this time there are no other plans for rapid transit facilities at either end of the proposed Project Corridor that could provide a necessary connection into a larger transit system.

3.14 COMMENT: Concerning the Illinois Route 7/159th Street interchange going west into Lockport, in all past meetings, including condemnation procedures, I was told the median was to be crossable allowing access to the First Assembly of God

Church from both directions. Plans now call for a barrier that cannot be crossed. This will be difficult for our congregation.

3.14 RESPONSE: IDOT/ISTHA will review this issue and coordinate with Church representatives as part of future project development. However, it should be noted that the plans have not changed and specify a 2 inch mountable median that will not prohibit access to the church.

3.15 COMMENT: The project has already taken First Assembly of God Church property. Plans seem to indicate more will be taken. Is this true?

3.15 RESPONSE: No additional permanent right-of-way is necessary along 159th Street. The graphics displayed at the Public Hearing showed existing right-of-way. Plans do call for a temporary easement to construct a new driveway.

3.16 COMMENT: Plans indicate the elevation of 159th Street at the interchange will be raised 5 feet. How will this effect access to the First Assembly of God Church? Will there be guardrail?

3.16 RESPONSE: 159th Street will be elevated as it crosses over the extension. The elevation varies across the First Assembly of God Church property. The further away from the extension, the closer 159th Street will be to existing grade. Access will be maintained to the property. Guardrail will be evaluated during the design phase.

3.17 COMMENT: Looks like the Lemont Bypass Alternative or the Enhanced Arterial Alternative would work as well as the Preferred Alternative.

3.17 RESPONSE: As documented in Section 3.4 of the Draft SEIS, the analysis indicates that the Tollroad/Freeway Alternative performs substantially better and is therefore preferred.

3.18 COMMENT: Why widen Cedar Road on the east side where there are homes instead of doing all widening on the west side of the road which is an empty field. Will there be a steel barricade to protect the residential properties?

3.18 RESPONSE: North of I-80, Cedar Road is realigned to the east away from existing homes. South of I-80, Cedar Road is tied back into the existing alignment north of any residential properties. At U.S. Route 6 and Cedar the widening is symmetrical about the centerline. The setback of the existing houses is large enough in this area not to warrant a shift in the alignment. Guardrail locations will be determined during the design phase.

3.19 COMMENT: How many cubic yards of material, including cuts and fill, will be moved during the project.

3.19 RESPONSE: Engineering details such as quantities of cut and fill were not evaluated as part of the Draft SEIS. Information such as this will be determined during final design.

3.20 COMMENT: Add park and ride lots to the project for car-pooling.

3.20 RESPONSE: Comment noted. We are working with Pace to enhance transit opportunities along the proposed I-355 extension.

3.21 COMMENT: Widening the existing two lane roads to four lanes only near interchanges will cause traffic gridlock similar to what happened in DuPage County.

3.21 RESPONSE: Improvements are proposed at critical locations, especially near interchanges to address the projected Year 2020 traffic demand. Additionally, the Preferred Alternative will not preclude the implementation of local roadway improvements that may be necessary in the future. Planning for the proposed roadway widening takes into consideration both existing development and the growth projected to occur in the Project Corridor. The largest impact to local roadways will be the growth coming regardless of any of the Build Alternative, which will be addressed as part of ongoing and future transportation planning.

3.22 COMMENT: In our area, traffic moves in ALL directions, yet this proposed extension of I-355 would carry traffic only in a north-south direction.

3.22 RESPONSE: The Build Alternative provide for a north-south orientation which satisfies the basic need for improved transportation access to the north as stated in the Purpose and Need for the project. However, regionally, traffic flows are accommodated in all directions by providing access to the interstate system. On the local level, the proposed extension of I-355 provides a new crossing of the Des Plaines River Valley. This additional crossing minimizes the circuitous travel along the local roadway network in all directions.

4.0 ENVIRONMENTAL CONSEQUENCES

4.1 COMMENT: The Preferred Alternative will increase congestion on local roads and increase the level of hazardous air pollution.

4.1 RESPONSE: The most substantive impact to local roadways will be the growth that occurs over the next 20 years regardless of the I-355 extension. Imrovements to local roadways are proposed as part of the I-355 extension. Additionally, the I-355 extension will not preclude the implementation of other improvements that may be necessary in the future.

In terms of air quality, an analysis of regional and local impacts was conducted. As documented in sections 2.13 and 4.12 of the Draft SEIS, the I-355 extension would not adversely impact air quality.

4.2 COMMENT: How will 127th Street handle the 25,000 vehicles per day that is being projected under the 2020 Tollroad/Freeway Average Daily Traffic?

4.2 RESPONSE: Improvements are being made to feeder roads. It is also likely that additional improvements will be made in the area, especially with the substantial growth in volume that will take place regardless of the development of the Preferred Alternative between now and 2020. The planning process is continuous for roadway improvements.

4.3 COMMENT: Won't the extension of I-355 add more traffic to the local roadway system?

4.3 RESPONSE: Traffic will likely be higher at some of the interchange areas, and improvements are proposed at these locations. The most substantial growth in traffic volumes is expected regardless of the Preferred Alternative between now and 2020. The extension of I-355 will reduce traffic on the overall local roadway system.

SOCIAL IMPACTS

4.4 COMMENT: IDOT and ISTHA should not be allowed to purchase land for right-of-way until final financing and EPA and FHWA approval of the project has been granted. Furthermore, the agencies should compensate homeowners with "replacement" value for their property and not "fair market" value.

4.4 RESPONSE: After the Record of Decision in 1996, which included FHWA approval, property was acquired for ROW. The acquisition occurred at fair market value in accordance with ISTHA policies.

4.5 COMMENT: How many residents are going to be displaced as a result of the Preferred Alternative?

4.5 RESPONSE: The number of residences, not residents, was identified in the 1996 FEIS, Section 4.2.2. The number is 52.

4.6 COMMENT: How will the Preferred Alternative affect school systems, municipal and township services, taxes and quality of life?

4.6 RESPONSE: Indirect effects associated with the tollroad/freeway will vary by community and will depend heavily on local government and planning. The feedback received during the Public Hearing process indicated overwhelming support for the improvement and viewed it as a positive development.

4.7 COMMENT: The City of Lockport was allowed to annex tollway right-of-way in Homer Township.

4.7 RESPONSE: The Illinois State Toll Highway Authority did not purchase any property from Homer Township as part of the I-355 Extension project. It did, however allow Lockport to annex a portion of Authority land. This was done to allow a landowner, whose total holding was bisected by the project, to have all of his property brought into the City at once. Had the tollway improvement been constructed in this area, as opposed to remaining undeveloped right–of-way, the owner would have been able to annex his property without the Authority's property having been annexed. In the consideration of the Authority, allowing the Lockport annexation was the equitable solution. In the other instance of Lockport annexing Authority property, the annexation of a small portion of property which will ultimately contain an access road was allowed, in exchange for Lockport's acceptance of maintenance and jurisdiction over the road, once built, as well as the provision of water and sewer service to a future plaza facility.

4.8 COMMENT: What assurances are there that we will not lose property value or be bought out and cheated on our property as happened with other homeowners.

4.8 RESPONSE: All property owners were given fair market value. The Chicago metropolitan region has many examples of highways adjacent to residential properties. Property values remain strong, even new residential developments are built next to existing highways. This project has not studied this issue, however. Any additional acquisition will be in accordance with applicable ISTHA policies. However, additional acquisition is not anticipated.

ECONOMIC IMPACTS

4.9 COMMENT: Will the extension really bring economic growth to the area?

4.9 RESPONSE: The Draft SEIS found that while the Northeastern Illinois Planning Commission (NIPC) forecasts a doubling in employment within the Study Area between 1990 and 2020, the impact of the Preferred Alternative on stimulating this employment growth was negligible. Constructing the Preferred Alternative would not increase employment growth beyond that projected under the No-Action (Baseline) Alternative. The Preferred Alternative would influence employment distribution within the Study Area, acting to concentrate job growth geographically within the vicinity of the Tollroad/Freeway alignment junctions with I-55 and I-80.

4.10 COMMENT: If it's a tollroad, I want Lemont to get a piece of the money. Each and every person should benefit from the tollway.

4.10 RESPONSE: Comment noted.

LAND USE AND ZONING

4.11 COMMENT: The Preferred Alternative and the development that it brings will destroy thousands of acres of open space.

4.11 RESPONSE: Development in the Project Corridor is already occurring at a rapid rate (Approximately 4,050 hectares (10,000 acres) in last decade). The I-355 South Extension accounts for less than two percent of the overall total. Land use zoning, which development must comply with, is the sole responsibility of the local government with control over that land, and is not directly linked to the Preferred Alternative.

4.12 COMMENT: Forest preserves, wetlands and open space should take first priority over roadways, which will only serve to pollute these areas with additional roadway runoff.

4.12 RESPONSE: With local travel expected to worsen by 150%, a major improvement is clearly needed. Every effort is being made to minimize impact. Open space is under the jurisdiction of local governments. It is their judgments that determine the best use of the open land and whether it becomes protected or developed. This project has been developed with great concern for the impacts to forest preserves and natural resources. In an effort to maintain the quality of such resources, roadway runoff will be collected and distributed into drainage discharge basins that are designed to minimize hydrologic changes. In addition, grass-lined discharge ditches will be included to reduce suspended particulates and heavy metals, thereby minimizing water quality impacts.

4.13 COMMENT: The extension of I-355 will only accelerate the poor planning and haphazard growth of the area.

4.13 RESPONSE: Local land use zoning is the sole responsibility of the local municipality or County that has jurisdiction over that land. The Draft SEIS does not provide recommendations on land use zoning. Growth will occur whether or not the preferred alternative in constructed. Also, the Heritage Corridor Planning Council was formed to coordinate the planning efforts of the local governments and manage the growth of the area.

4.14 COMMENT: I am concerned that the Preferred Alternative will only add to the unwanted growth of the region.

4.14 RESPONSE: Socio-economic analysis presented in the Socio-Economic and Land Use Impacts of the Proposed I-355 Extension, October 2000 found that population growth attributable to the Tollroad/Freeway Alternative would amount to only 2 percent of the total 2020 population of the Project Corridor. Growth within the Project Corridor is managed on the local level by local municipalities and on the regional level by both the County and the Heritage Corridor Planning Council (HCPC). The Project Corridor is currently developing rapidly, and with or without the Preferred Alternative, this development will continue.

4.15 COMMENT: Will the extension of I-355 to I-80 lead to more urban sprawl?

4.15 RESPONSE: Project team 2020 population and employment forecasts for the No-Action (Baseline) Alternative project population and employment will nearly double within the Study Area with or without the extension of I-355. The Tollroad/Freeway Alternative will aid in containing urban growth. The Socio-Economic and Land Use Impacts of the Proposed I-355 Extension, October 2000, states that the benefit of the Tollroad/Freeway Alternative is that it consolidates growth closer to existing urban development and at higher densities within the Corridor. Geographically, the Project Corridor represents one of the last major area of land open for development with a 48 kilometer (30 mile) radius of the Chicago central area. Developing this area would be consistent with NIPC regional development goals of keeping the urbanized areas compact by focusing development as close as possible to the Chicago urban core.

4.16 COMMENT: They're going to zone land along 127th Street for commercial property. I would like parks not commercial property.

4.16 RESPONSE: Local land use zoning is the sole responsibility of the local municipality or County that has jurisdiction over that land. The Draft SEIS does not provide recommendations on land use zoning.

AGRICULTURAL IMPACTS

4.17 COMMENT: Project will result in reduction of food by reducing farmland.

4.17 RESPONSE: The overall impact is minimal. According to the Will County Land Resource Management Plan (Draft SEIS, Exhibit 1-6) prepared for the Will County Land Use Department, the Project Corridor consists of areas designated as urban communities, contiguous growth areas and high accessibility corridors.

There are no agricultural preservation areas within the Project Corridor. Within the State of Illinois there exists over 11.3 million hectares (28 million acres) of agricultural land. The Proposed Action will require 137 hectares (338 acres), roughly 0.001% of the total agricultural land in the State. The Illinois Department of Agriculture (IDOA) is quoted as saying, "In 1995 and 1996, the IDOA reviewed the Draft and Final Environmental Impact Statements (EISs) that were prepared for this project. We determined that IDOT's Preferred Alternative was consistent with intent of the state's Farmland Preservation Act (505 ILCS 75/1 et seq.). The Draft Supplemental Final EIS states that the project's agricultural impacts have not changed since the Draft and Final EISs were prepared. Therefore, the IDOA continues to find the project in compliance with the intent of the state's Farmland Preservation Act."

FOREST PRESERVES AND PARKS

4.18 COMMENT: I am opposed to any alternative that does not pass to the west of Black Partridge Woods and Keepataw Woods Forest Preserves.

4.18 RESPONSE: The Preferred Alternative does pass west of Black Partridge Woods. While the extension does pass through Keepataw Forest Preserve, our studies indicate that this is the best place to cross these natural resources (Final SEIS, 3.4.2).

CUTURAL RESOURCES

4.19 COMMENT: Make sure that a mound southwest of Black Partridge Forest Preserve is not an Indian burial mound before the road goes through it.

4.19 RESPONSE: Comment noted. The Project Corridor was examined by archaeologists and no Indian issues were uncovered. Many mounds in the area are tailings from mining activities, as was the case in this instance.

WATER QUALITY AND WATER RESOURCES

4.20 COMMENT: The project will cause urbanization, which will cause increases in flood damage and erosion.

4.20 RESPONSE: The Project Corridor is already experiencing rapid development. The Draft SEIS found that the Preferred Alternative will have a minimal impact on the Project Corridor's population. The Draft SEIS is consistent with the findings of the project team, which forecasts a doubling in population within the Project Corridor from 1990 to 2020, regardless of the I-355 extension. The Socio-Economic and Land Use Impacts of the Proposed I-355 Extension, October 2000, states that the benefit of the Tollroad/Freeway Alterantive is that it consolidates growth closer to existing urban development and at higher densities within the Corridor.

4.21 COMMENT: Consider cutting edge techniques for salt pollution control on bridge, such as recycling and electric heat.

4.21 RESPONSE: Comment noted.

NOISE

4.22 COMMENT: Concern regarding noise pollution surrounding the 127th Street and Interstate Route 80 interchanges and various other residential subdivisions within the Project Corridor have been raised. Why aren't noise attenuation barriers proposed at these locations?

4.22 RESPONSE: These areas have been analyzed as per IDOT and Federal Agency methodologies, and results from this analysis do not warrant mitigation.

4.23 COMMENT: Why not place the extension below grade to minimize noise levels?

4.23 REPONSE: Every opportunity was made to depress the roadway where possible to reduce traffic noise levels and many locations are below grade. At some interchanges, ramps are elevated and provide some noise shielding. Consideration of other impacts to the surrounding areas also determined roadway elevations, such as placing the roadway above flood elevations.

4.24 COMMENTS: Noise levels should not be allowed to increase.

4.24 RESPONSE: An increase in traffic-generated noise is an unavoidable consequence of building a new roadway. Mitigation of this noise increase is being implemented in accordance with policy. Noise is also an unavoidable consequence of development. The Project Corridor is currently developing rapidly, and with or without the Preferred Alternative, this development will continue. Socio-economic analysis presented in the Socio-Economic and Land Use Impacts of the Proposed I-355 Extension, October 2000 found that population growth attributable to the Tollroad/Freeway Alternative would amount to less than 2 percent of the total 2020 population of the Project Corridor. Noise levels will increase with or without the Tollroad/Freeway.

4.25 COMMENT: Bolingbrook is one of the only places with noise barriers. This seems very discriminatory.

4.25 RESPONSE: This was one of the areas along the Corridor which met criteria per IDOT Bureau of Design and Environment Manual 26-6, Noise Analysis (Draft SEIS Table 4-5).

4.26 COMMENT: Berms are preferred over walls for noise control.

4.26 RESPONSE: Agreed, however, berm bases are wide and may interfere with drainage patterns and additional right-of-way may need to be purchased, as compared to walls.

4.27 COMMENT: Points in need of noise walls include Division Street Overpass (Gougar Road), the 159th Street Interchange frontage road, 127th Street area and 135th Street area.

4.27 RESPONSE: These areas have been analyzed as per IDOT Bureau of Design and Environment Manual 26-6, Noise Analysis, and results do not warrant mitigation (Draft SEIS Table 4-5).

VISUAL IMPACTS

4.28 COMMENT: Put the extension underground and plant some trees. I want a lot of trees planted along 127th Street.

4.28 RESPONSE: Comment noted.

SECONDARY AND CUMULATIVE IMPACTS

4.29 COMMENT: The Preferred Alternative will lead to the South Suburban Expressway extension from Interstate Route 80 to Interstate Route 57. Is such a study underway and where are the proposed routes located?

4.29 RESPONSE: The projects are not linked. A separate study has been undertaken by ISTHA to review need for the South Suburban. Studies for this project are ongoing.

5.0 SECTION 4(F) EVALUATION

5.1 COMMENT: Disagree with location of Section 4(f) mitigation site.

5.1 RESPONSE: Comment noted.

6.0 COORDINATION AND COMMITMENTS

6.1 COMMENT: A true Public Hearing should be held with a debate of opposing views, not an "open house".

6.1 RESPONSE: The open house style of public hearing has been endorsed by FHWA as an effective means of receiving citizen feedback. It offers flexibility in terms of participation and encourages candid exchanges of information.

6.2 COMMENT: Does the public really have a say in whether or not this project gets implemented?

6.2 RESPONSE: Yes, the public has driven much of the project to date. The project has overwhelming support.

6.3 COMMENT: Homer Township was left out of the decision making process.

6.3 RESPONSE: Homer Township, like all local governments, has provided input into the decision making process since the study's inception in 1987.

7.0 MISCELLANEOUS

7.1 COMMENT: Where is funding for this project going to come from? Aren't the tolls supposed to be eliminated?

7.1 RESPONSE: Funding for the project is beyond the scope of this EIS.

7.2 COMMENTS: The road should not be a tollway if it is paid for with taxes.

7.2 RESPONSE: Funding for the project is beyond the scope of this EIS.

7.3 COMMENT: Previously acquired property for the tollway is now for sale. Should that property be offered back to the original owners that were displaced and ruined and cheated by the Tollway Authority and not to just some "fat cat" developer or people who have buddies that are connected?

7.3 RESPONSE: Comment noted.

7.4 COMMENT: ISTHA and IDOT never formed the Citizens Advisory Group.

7.4 RESPONSE: The purpose of the South Extension Advisory Committee would be to coordinate, design, and construction related issues. No decision has been made at this point regarding construction of any improvements. State legislation requires the authority to create a "Local Advisory Committee" when a Tollroad is proposed and funded. The committee's purpose, as outlined, is to "consider and advise the authority with respect to the impact on property owners, land use, and other impacts of the projected highway." Its role is to offer opinion and information. Members are appointed by the townships and municipal governing bodies and the authority's role is limited to providing minutes, agendas, etc. No decision has been made at this point regarding funding of any improvements. However, a committee will be formed at such time.

7.0 LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM THE FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT WAS SENT

7.1 Federal Agencies

Advisory Council on Historic Preservation
Federal Aviation Administration
Federal Railroad Administration
U.S. Army Corps of Engineers
U.S. Department of Agriculture
U.S. Department of Commerce
U.S. Department of Health and Human Services
U.S. Department of Housing and Urban Development
U.S. Department of the Interior
U.S. Coast Guard, Ninth District
U.S. Environmental Protection Agency

7.2 State Agencies

Illinois Bureau of the Budget
Illinois Commerce Commission
Illinois Department of Agriculture
Illinois Department of Corrections
Illinois Department of Natural Resources
- Office of Mines and Minerals
- Office of Water Resources

Illinois Department of Public Health
Illinois Department of Transportation
- Division of Aeronautics

Illinois Environmental Protection Agency
Illinois Historic Preservation Agency
Illinois Geological Survey
Illinois Natural History Survey
Illinois State Clearinghouse
Illinois State Library
Illinois Water Survey

7.3 Local Agencies

Chicago Area Transportation Study
City of Joliet
City of Lockport
Cook County Board
Cook County Highway Department
Cook County Planning Department
Downers Grove Township
DuPage County Board

DuPage County Division of Transportation
DuPage County Regional Planning Commission
DuPage County Planning Department
DuPage Township
Forest Preserve District of Cook County
Forest Preserve District of DuPage County
Forest Preserve District of Will County
Homer Township
Joliet Township
Joliet Urbanized Area Council of Mayors
Joliet/Will County Center for Economic Development
Lemont Fire Protection District
Lemont Park District
Lemont Township
Lockport Township
Lockport Township Park District
Metra
Metropolitan Water Reclamation District of Greater Chicago
New Lenox Park District
New Lenox Township
Northeastern Illinois Planning Commission
Northwest Homer Fire Protection District #1
Pace
Regional Transportation Authority
South Suburban Mayors and Managers Association
Village of Bolingbrook
Village of Frankfort
Village of Lemont
Village of Mokena
Village of New Lenox
Village of Orland Park
Village of Romeoville
Village of Woodridge
Will County Board District 3
Will County Chamber of Commerce
Will County Governmental League
Will County Highway Department
Will County Land Use Department
Will County Municipal League
Will County Planning Department
Will-South Cook Soil and Water Conservation District
Woodridge Park District

7.4 Utilities

Commonwealth Edison Company

7.5 Libraries

Chicago Public Library - Harold Washington Library Center
Des Plaines Valley Public Library (Lockport Branch)
Des Plaines Valley Public Library (Romeoville Branch)
Fountaindale Public Library (Bolingbrook Branch)
Fountaindale Public Library (Romeoville Branch)
Homer Township Public Library (Lockport)
Joliet Public Library
Lemont Public Library
New Lenox Township Public Library (New Lenox)
Poplar Creek Public Library
University of Illinois Library
Woodridge Public Library

7.6 Organizations

BNSF Corporation
Business and Professional People for the Public Interest
CN Railroad
Environmental Law and Policy Center

7.7 Internet

The Internet address is http://www.dot.state.il.us

8.0 LIST OF PREPARERS

The persons listed below were responsible for preparing this Supplemental Final Environmental Impact Statement, technical reports, or background studies relevant thereto.

8.1 FEDERAL HIGHWAY ADMINISTRATION

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Don Keith	Environmental Engineer FHWA, Illinois Division Office.	Right-of-Way Officer
Jon-Paul Kohler	Right-of-Way Officer FHWA, Illinois Division Office.	Planning and Program Development Manager

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8.2.1 Office of the ~~Secretary of State~~ Chief Counsel

Name	Qualifications	Primary Responsibilities
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8.2.2 Bureau of Design and Environment

Name	Qualifications	Primary Responsibilities
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Name	Qualifications	Primary Responsibilities
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8.3 IDOT District 1

8.3.1 Bureau of Programming

Name	Qualifications	Primary Responsibilities
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8.4 Consultants

Name	Qualifications	Primary Responsibilities
Louis V. Arrigoni	B.S., Civil Engineering; HDR Engineering, 1988 to present.	Noise Impact Analysis
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9.0 REFERENCES

9.1 Purpose of and Need for Action

Illinois Department of Transportation, Revised FAP Route 340 SFEIS Purpose and Need, 2020 RTP Goals and Objectives Technical Memorandum, May 1999, revised December 1999, June 2000, April 2001, July 2001.

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9.2 Affected Environment

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9.3 Alternatives

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9.4 Environmental Consequences

Peters, Cathy R., Jim Osbourne, Gary J. Stensland and Allen L. Williams. Atmospheric Dispersion Study of Deicing Salt Applied to Roads: First Progress Report. Contract Report 2000-05, prepared for the Illinois Department of Transportation and Illinois State Toll Highway Authority, April 2000.

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10.0 INDEX

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11.0 GLOSSARY

The following terms are used throughout this document:

Action Area: All areas to be affected directly or indirectly by the Proposed Action and not limited to the immediate area involved in the action.

Air Quality Index, AQI: The AQI is an index for reporting daily air quality statistics. It documents how clean or polluted a region's air is, and what associated health concerns people should be aware of. The AQI focuses on health effects that can happen within a few hours or days after breathing polluted air. EPA uses the AQI for five major air pollutants regulated by the Clean Air Act: ground-level ozone, particulate matter, carbon monoxide, sulfur dioxide, and nitrogen dioxide. For each of these pollutants, EPA has established national air quality standards to protect against harmful health effects.

The al Chalabi Group, Ltd, ACG: A firm specializing in demographic and socioeconomic forecasts.

Ambient: Surrounding; encircling (e.g., ambient sound; ambient air).

Amphibian: Relating to or characteristic of animals of the class Amphibia, cold-blooded vertebrate typically living on land but breeding in water.

Army Corps of Engineers, **ACOE:** A division of the Federal government whose mission is to provide engineering services to the nation including water resources, civil works facilities, military facilities and construction management for the Department of Defense and other federal agencies. The Agency also administers Section 404 of the Clean Water Act and regulates impacts to wetlands and other waters of the United States.

Arterial: Arterials are designed to serve through travel in rural areas and as circulatory routes for a limited service area in urban areas.

Average Daily Traffic, **ADT:** The total volume of traffic during a given time period (in whole days), greater than one day and less than one year, divided by the number of days in that time period.

Biological Assessment: Information on listed and proposed plant and animal species, including designated and proposed critical habitat that may be present in the Proposed Action area and the evaluation of potential effects of the action on such species and habitat.

Bypass: An alternative route usually around a specific feature such as a town.

CAL3QHC: A microcomputer based model developed by the U.S. EPA that predicts pollutant concentrations from motor vehicles at or near roadway intersections.

Carbon Monoxide Screen for Intersection Modeling, COSIM: A modeling program used to calculate the carbon monoxide concentrations, based on the intersection geometry, user inputs and worst case assumptions.

Chicago Area Transportation Study, CATS: The Chicago Area Transportation Study is designated by the state and local officials as the Metropolitan Planning Organization (MPO) for the northeastern Illinois region. The MPO is responsible together with the state for carrying out the urban transportation planning process in this region. The north-

eastern Illinois region includes: Cook, DuPage, Kane, Lake, McHenry and Will Counties and a portion of Kendall County.

Chicago central area: Downtown Chicago central business district.

Chicago Transit Authority, CTA: The division of the Regional Transportation Authority (RTA) responsible for the day-to-day operations and planning for the rapid transit and bus systems serving the city of Chicago and near in suburbs. The CTA operates the nation's second largest public transportation system and covers the City of Chicago and 38 surrounding suburbs.

Code of Federal Regulations, CFR: Document that codifies all rules of the executive departments and agencies of the federal government. It is divided into fifty volumes, known as titles. Title 40 of the CFR (referenced as 40 CFR) lists all environmental regulations.

Compensation Ratios: Relationship between the amount of compensation required as compared with the amount of adverse impact to a wetland.

Contiguous: In actual contact; touching; also adjacent; near; neighboring; adjoining.

Converted Wetland: A wetland that does not meet the definition of a wetland because of an alteration of the wetland area hydrology, plants or soil.

Criteria Pollutants: The 1970 amendments to the Clean Air Act required EPA to set National Ambient Air Quality Standards for certain pollutants known to be hazardous to human health. EPA has identified and set standards to protect human health and welfare for seven pollutants: ozone, carbon monoxide, particulate matter (2.5 and 10 micrometers in size), sulfur dioxide, lead, and nitrogen oxide. The term, "criteria pollutants" derives from the requirement that EPA must describe the characteristics and potential health and welfare effects of these pollutants. It is on the basis of these criteria that standards are set or revised.

Cumulative effects: Impacts which result from the incremental consequences of an action when added to other past and reasonably foreseeable future actions.

(dBA): The smallest change in sound level an average person can detect under ideal conditions

Delineation: Determining the boundaries of a jurisdictional wetland.

Department of Transportation, DOT: Established by an act of Congress on October 15, 1966, its mission is to serve the United States by ensuring a fast, safe, efficient, accessible and convenient transportation system that meets our vital national interests and enhances the quality of life of the American people, today and into the future.

Disaggregated Residential Allocation Model/Employment Allocation Model, DRAM/EMPAL: A land use planning model that, based on patterns of accessibility and relative attractiveness, forecasts where new development will occur and, consequently, the future distribution of households and employment.

Displacement: Commercial or residential structure that is within the Right-of-Way that will be removed and relocated.

EAI: Existing O'Hare and Midway Airports.

Elgin, Joliet and Eastern Railroad, EJ&E: The location of Metra's proposed Outer Circumferential Commuter Rail Corridor.

Emergent: An erect, rooted, herbaceous wetland plant that may be temporarily or permanently flooded at its base but is nearly always exposed at the upper portion. Most swamps, bogs, marshes and prairie wetlands contain emergent vegetation.

Emission Rates: The rate at which pollutant is emitted by a source.

Federal Highway Administration, FHWA: A division of the USDOT that provides technical expertise to its partners and customers in areas such as roadway and bridge design, construction and maintenance, highway safety, and environmental protection and enhancement.

Federal Transit Administration, FTA: A division of the USDOT that provides technical expertise in the areas of transit, including rail, bus, people movers, etc.

Final Environmental Impact Statement, FEIS: A detailed written statement, prepared for major Federal actions significantly affecting the quality of the human environment, which discusses the environmental impacts of the proposed action; any adverse environmental effects which cannot be avoided should the proposal be implemented; alternatives to the proposed action; the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity; and any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.

Floristic Quality Index, FQI: Provides a measure of floristic integrity or a brief functional assessment of an area's vegetation.

Forblands: Field, prairie or meadow covered with broad-leaved herbs other than grass.

FPDWC: Forest Preserve District of Will County.

Freeway: A high speed – high capacity arterial used to transport a high proportion of the total urban/suburban travel on a minimum of kilometers and serving a major portion of trips entering and leaving an urban area. Used extensively to provide continuity within urban areas, serve the major economic activity centers and accommodate the longest regional and intraurban trips.

Functional Classification: The process by which highways and streets are grouped into classes or systems based on the character of service they are intended to provide.

Gary, Chicago, Milwaukee Priority Corridor, GCM: One of four "Priority Corridors" throughout the country. These corridors have been selected for special federal transportation funding based on very specific transportation and environmental criteria. The Corridor includes the greater metropolitan areas of Gary, Chicago and Milwaukee as well as portions of southeast Wisconsin, northeast Illinois, and northwestern Indiana. The Corridor was defined to allow for a wide range of solutions for movements throughout the Corridor, including high-speed rail.

Historic American Building Survey, NABS: The program documents important architectural, engineering and industrial sites throughout the United States and its territories. A complete set of documentation consists of measured drawings, large format photographs, and written history.

Hydric Soil: Soils that are saturated, flooded or ponded long enough during the growing season to develop anaerobic conditions that favor the growth and regeneration of hydrophytic vegetation.

Hydrologic Unit: Divisions of the United States into successively smaller watersheds or drainage areas.

Hydrology: The study of the properties, distribution and circulation of water, specifically water on the surface or land, in the soil and underlying rocks, and in the atmosphere. Also used to refer to the characteristics of water flow in or on a given site.

IDOT Bureau of Design and Environmental Manual, IDOT BDE Manual: a resource that provides guidelines to establish uniform practices for the Department of Transportation and consultant personnel in the state of Illinois. The Manual presents a majority of the information normally required in the development of a typical roadway project.

Illinois and Michigan Canal, I&M Canal: Completed in 1848, the canal connects the Great Lakes to the Mississippi River watershed along a longstanding Native American portage route. The 156kilometer (97 miles) canal extends from the Chicago River near Lake Michigan to the Illinois River at Peru, Illinois.

Illinois Department of Transportation, IDOT: The agency has responsibility for planning, construction and maintenance of Illinois' extensive transportation network, which encompasses, highways and bridges, airport, public transit, rail freight and rail passenger systems.

Illinois Environmental Protection Agency, IEPA: The agency that works to safeguard environmental quality, consistent with the social and economical needs of the State of Illinois, so as to protect health, welfare, property and quality of life.

Illinois Natural History Survey, INHS: An organization made of scientists that study the plants and animals of Illinois and how they interact among the variety of ecosystems throughout the state.

Illinois State Highway System: Consists of all highways under the jurisdiction of the Illinois Department of Transportation. This system contains all Interstate highways, all other marked State and U.S. routes, and some unmarked routes. The Department useseither a combination of Federal funds and State funds or State-only funds for improvements on the State highway system.

Illinois State Historic Preservation Officer, SHPO: Administers the national historic preservation program at the State level, review National Register of Historic Places nominations, maintain data on historic properties that have been identified but not yet nominated, and consult with Federal agencies during Section 106 review. SHPOs are designated by the governor of their respective State or territory.

Illinois State Toll Highway Authority, ISTHA: The Authority is a user financed administrative agency of the State of Illinois whose purpose is to operate, maintain and service a system of tollroads in the northern portion of the State, with an approximate total length of 443 kilometers (275 miles).

Infrastructure: An underlying base or foundation especially for an organization or a system. The basic facilities, services and installations needed for the functioning of a community or society, such as transportation and communications systems, water and power lines, and public institutions including schools, post offices and prisons.

Intermodal: Planning and infrastructure that reflects a focus on connectivity between modes of transportation as a means of facilitating linked trip making. It emphasizes connection, choices, coordination and cooperation.

I-PASS: The electronic toll collection system used by ISTHA.

Jurisdiction: The authority and obligation to administer, control, construct, maintain and operate a highway subject to the provisions of the *Illinois Highway Cod*e.

Land and Water Conservation Fund (Act), LAWCON: A Federal source of funding for parks and recreational areas.

L_{eq}: The sound level which, in a stated period of time, contains the same acoustic energy as the varying sound level during the same time period based on FHWA Regulations.

Local Roads and Streets: All public roads and streets not classified as arterials or collectors are classified as local roads and streets. Local roads and streets are characterized by the many points of direct access to adjacent properties and the relatively minor value in accommodating mobility. Speeds and volumes are usually low and trip distances short.

Macroinvertebrates: An invertebrate animal (animal without a backbone) large enough to be seen without magnification.

Memorandum of Agreement, MOA: An agreement between two governmental agencies or other units of government.

Metra: The division of Regional Transit Authority responsible for the day-to-day operations and planning for the commuter rail system serving the northeastern Illinois region.

Metropolitan Planning Organization, MPO: A federally mandated government agency, designated by state and local officials as being responsible for long-range transportation planning and programming for a metropolitan area.

Mitigation Measures: Activities identified in the environmental process intended to lessen the severity of any unavoidable environmental impacts precipitated by the proposed action.

MOBILE 5b: Mobile 5b is a computer program that calculates emission factors for carbon monoxide, hydrocarbons and nitrogen oxides. The program was developed by U.S. EPA for this purpose and it is used by most states across the country for calculating emission factors used in preparing emission inventories, State Implementation Plans and carbon monoxide conformity analysis.

National Ambient Air Quality Standards, NAAQS: Standards which, in the judgment of the Administrator, if attained and maintained, will provide an adequate margin of safety to protect the public health.

National Wetlands Inventory, NWI: The National Wetlands Inventory (NWI) of the United States Fish and Wildlife Service produces information on the characteristics, extent, and status of the Nation's wetlands and deepwater habitats.

Natural Resource Conservation Service, NRCS: The Natural Resources Conservation Service of the United States Department of Agriculture is a Federal agency that works in partnership with the American people to conserve and sustain our natural resources.

No-Action (Baseline) Alternative: The No-Action (Baseline) Alternative represents the transportation system expected to be in place by 2020 without the proposed action. The No-Action (Baseline) Alternative is a combination of the existing roadway network with the transit and TSM improvements recommended in the 2020 RTP plus the No-Action (Baseline) roadway improvements. The No-Action (Baseline) Alternative provides a basis for evaluating the Build Alternatives.

No-Action (Baseline) Roadway Improvements: No-Action (Baseline) Alternative maintains existing roadways, includes roadway capacity improvements, transit upgrades, and TSM/TDM strategies in the 2020 RTP and current programs*, minus the proposed transportation system improvement. The No-Action (Baseline) also includes a number of other roadway projects that are not currently funded but anticipated to be constructed by the year 2020. The No-Action (Baseline) Alternative was developed on the basis of close coordination with area transportation providers and local officials. Draft SEIS Section 3.2.1 further defines the projects comprising the No-Action (Baseline) Alternative. .

Noise Abatement Criteria, NAC: Noise impact thresholds for considering abatement. They are designed to achieve a substantial noise reduction.

Noise Abatement: The act of limiting the amount of noise that carries from a source to a noise receptor. There are three ways to accomplish this: change the source, relocate the receptor or change the noise path between the source and the receptor.

Non-attainment: A classification indicating noncompliance with pollutant concentration standards.

Northeastern Illinois Planning Commission, NIPC: The Northeastern Illinois Planning Commission - is the official comprehensive planning agency for the six-county Chicago metropolitan area. The Commission was created by the Illinois General Assembly in 1957 and assigned three broad responsibilities: to conduct research required for planning for the region, to prepare comprehensive plans and policies to guide the development of the region, and to advise and assist local governments.

ORD: O'Hare Airport.

Out of the Drainage Basin: A wetland compensation area located outside of the Hydrologic Unit boundary, which includes the site of the proposed project for which the wetland compensation is required.

* Using the best available information in the early spring of 1999, which was the 1998-2002 TIP

Palustrine Wetland: A freshwater wetland dominated by trees, shrubs, and emergent vegetation. Typically, palustrine wetlands are made up of marsh or swamp land. Other systems include marine, estuarine, riverine, and lacustrine (deep water, such as lakes).

Photochemical Reactions: A chemical process produced by the action of light.

Preferred Alternative: The Tollroad/Freeway Alternative is the Preferred Alternative recommended by IDOT for the Proposed Action. The Preferred Alternative includes construction of full access controlled tollroad/freeway facility with the No-Action (Baseline) improvements presented in Section 3.2.1 of this final SEIS. The tollroad/freeway facility would provide a six-lane divided highway from I-55 to 127th Street and a four-lane divided highway from 127th Street to I-80. Interchanges would be located at I-55, 127th Street, 143rd Street/IL Route 171 (Archer Avenue), IL Route 7 (159th Street), U.S. Route 6 and I-80. The proposed alignment would parallel Lemont Road, approximately 2.0 kilometers (1.2 miles) west, from I-55 to the Des Plaines River. At that point, the alignment will shift to the southeast, paralleling State Street approximately 1.2 km (0.75 miles) west from 127th Street to 143rd Street. The alignment would then parallel Gougar Road until 159th Street where the alignment shifts to the southeast. The Preferred Alignment ends where it intersects with I-80 approximately 0.4 kilometers (0.4 miles) east of Cedar Road.

Primary Pollutant: A pollutant emitted directly. Carbon monoxide is the most common primary pollutant associated with vehicle exhaust systems.

Productivity Cost: Average annual productivity cost equals the average hourly rate of a private employee as defined by the Bureau of Labor Statistics multiplied times 250 working days per year.

Project Corridor: The Project Corridor for the Preferred Alternative is characterized as a suburban/rural area within the urban fringe. The Project Corridor is located within northwestern Will County, with small portions extending into southern DuPage and southwestern Cook Counties (Exhibit 2-1). The Project Corridor crosses twelve municipal and township political subdivisions, the largest being the City of Joliet and the Village of Lemont. Other political subdivisions include Homer, DuPage, Lockport, Joliet and New Lenox Townships in Will County, as well as the western two-thirds of Lemont Township in Cook County and the southern one half of Downers Grove Township in DuPage County. Over 70 percent of the Project Corridor is within Will County.

Proposed Action: The south extension of Interstate Route 355 from Interstate Route 55 to Interstate Route 80.

Radial System: A system of highways radiating from a city center outwards, similar to a spider web. Such as I-94, I-90, I-55, I-290 and I-57.

Regional Transportation Authority, RTA: The RTA oversees local transportation operators in the six-county Chicago metropolitan area. RTA's three service boards - CTA, Metra (the suburban rail system) and Pace (the suburban bus system) recover collectively at least 50% of operating costs from farebox and other system revenues, as required by Illinois State Law. The RTA provides public funding for the agencies' remaining operating expenses.

Regional Transportation Plan (2020), 2020 RTP: The 2020 RTP was developed by CATS as part of the regional planning effort. The plan is a coordinated multimodal ground transportation system that maintains the existing transportation investments and serves future travel needs through 2020. The plan is integrated with northeastern Illinois' land resource management strategies and air quality goals. The 2020 RTP makes recommendations in 10 major areas based on an assessment of total system needs, growth forecasts and projected financial resources.

Secondary effects: Indirect impacts that are caused by an action and are later in time or further removed in distance but are still reasonably foreseeable.

Secondary Pollutant: A secondary pollutant is formed in the air by chemical reactions between primary pollutants, sunlight, normal atmospheric constituents and other secondary pollutants (reactive hydrocarbons and nitrogen oxides). A common example of a secondary pollutant is ozone.

Section 4(f) Evaluation: Documentation of involvement a project would have with Section 4(f) land. The Section 4(f) evaluation addresses alternatives to use of such land and measures to minimize any harm that would result from such use.

Section 4(f) Land: Land protected under 49 USC 303 (Section 4(f) of the USDOT Act of 1966); i.e., any publicly owned park, recreational area, or wildlife and waterfowl refuge or a historic site (publicly or privately owned) of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, recreational area, refuge or site). The term "historic site" includes both historic and prehistoric archaeological sites determined important for preservation in place.

South Suburban Airport, SSA: The proposed third major airport in the northeastern Illinois region at a south suburban site.

STAMINA 2.0: STAMINA 2.0 developed by FHWA computes highway traffic noise at nearby receivers and aids in the design of highway noise barriers.

State Implementation Plan, SIP: The statewide plan for achieving national ambient air quality standards as mandated by the Clean Air Act Amendment of 1990.

Study Area: The study area includes six townships: DuPage, Homer, Joliet, Lockport, New Lenox and Lemont/Downers Grove Townships.

Supplement to the Final Environmental Impact Statement (Final SEIS): A detailed written statement on changes in the proposed action and/or on the identification and analysis of new circumstances or information not addressed in the Draft or Final EIS, which would introduce new and changed environmental effects of significance on the quality of the human environment.

Traffic Analysis Zone, TAZ: The point on a grid defined by CATS that covers northeastern Illinois and is used for traffic modeling.

Traffic Noise Prediction Model (FWHA TNM), TNM: TNM developed by FHWA computes highway traffic noise at nearby receivers and aids in the design of highway noise barriers.

Transportation Control Measures, TCM: Any action or measure designed to reduce vehicle emissions or concentrations of air pollutants from transportation sources through improvements to vehicular flow or by reducing the number of vehicle trips.

Transportation Improvement Plan, TIP: The region's programming and implementation agenda of surface transportation projects that contains projects for which federal capital funding is sought, federal operating assistance desired as well as all regionally significant non-federally funded projects.

Transportation System Development Plan, TSD: A coordinated multimodal ground transportation system plan that maintains the existing transportation investments and serves future travel needs through 2010. The predecessor to the 2020 RTP, the 2010 TSD was also developed by CATS as part of the regional planning effort. The TSD was used for the 1996 FEIS.

Transportation System Improvement: The range of Build Alternatives considered in the 1996 FEIS and Final SEIS. This range of Alternatives included mass transit, transportation system management, further improvements to the existing highway network, a new expressway, the Lemont Bypass, the Enhanced Arterial and the Tollroad/Freeway Alternatives.

Transportation System Management, TSM: Strategies that focus on lower-cost capital projects, operational and institutional improvements, operating efficiency improvements, quality of service enhancements and the promotion of public transit.

TSP: Total Suspended Particulate matter.

USEPA or EPA: United States Environmental Protection Agency**:** A division of the Federal government responsible for the protection and oversight of the nations environment, including wetlands, rivers, air and waste

USFWS: U.S. Fish and Wildlife Service**:** The only agency of the U.S. Government whose primary responsibility is fish, wildlife, plant conservation and administering the Federal Threatened and Endangered Species Act.

Vehicle Miles of Travel, VMT: The summation of the total miles traveled by vehicles in a defined area.

vpd: Vehicles per day.

Watershed: The region draining into a river, river system, or other body of water.

Wetland: Land that has a predominance of hydric soils (soils which are usually wet and where there is little or no free oxygen) and that is inundated or saturated at a frequency and duration sufficient to support, and that under normal circumstances does support, a prevalence of hydrophytic vegetation (plants typically found in wet habitats) typically adapted for life in saturated soil conditions.

Wetland Compensation: The actions (restoration, creation and/or enhancement) necessary that result in the replacement of wetland function and area to offset project-induced wetland losses or impacts an adverse wetland impact, including land acquisition, planning, engineering, construction, monitoring and contingency actions.

Wetland Enhancement: Wetland management or other activity that increases one or more natural or artificial wetland functions while minimizing adverse impacts to other wetland functions.

Wetland Management Practices: Activities that maintain, control and enhance wetland wildlife habitat. This includes the chemical and/or mechanical control of undesirable vegetation.

Wetland Mitigation: This term has two meanings, both of which are used in the text: 1) The actual enhancement, restoration, or creation of wetlands to compensate for permitted wetland losses in terms of area and wetlands functions and values, and 2) to protect wetlands by avoiding damage to them (i.e., long-term wetland protection status), by altering the design or timing of development to minimize negative impacts on wetlands, or by reducing external negative impacts (e.g., treating water pollution before it enters a wetland or creating a buffer area between the wetland and adjacent development).